

# **In the Matter of**

Case No.: 1:21-cv-7163 (HG)(LB)

STIDHUM

v.

161-10 HILLSIDE AUTO AVE, LLC, et al.

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**Examination of Leticia Francine Stidhum**

*Friday, February 17, 2023*

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
Case No.: 1:21-cv-7163 (HG) (LB)

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LETICIA FRANCINE STIDHUM,

Plaintiff,

-against-

161-10 HILLSIDE AUTO AVE, LLC d/b/a  
Hillside Auto Outlet, HILLSIDE AUTO  
MALL INC. d/b/a Hillside Auto Mall,  
ISHAQUE THANWALLA, JORY BARON,  
RONALD M. BARON, and ANDRIS GUZMAN,

Defendants.

-----X

February 17, 2023  
9:23 a.m.

Examination before Trial of PLAINTIFF,  
LETICIA FRANCINE STIDHUM, held pursuant to  
Notice, held via Zoom conference, before  
Ruthayn Shalom, a Notary Public of the State of  
New York.

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A P P E A R A N C E S :

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BY: EMANUEL KATAEV, ESQ.  
emanuel@mllaborlaw.com

ALSO PRESENT:  
Ishaque Thanwalla

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2 IT IS HEREBY STIPULATED AND AGREED, by  
3 and between the attorneys for the respective  
4 parties hereto, that this examination may be  
5 sworn to before any Notary Public.

6  
7 IT IS FURTHER STIPULATED AND AGREED that  
8 the sealing and filing of the said examination  
9 shall be waived.

10  
11 IT IS FURTHER STIPULATED AND AGREED that  
12 all objections to questions except as to form  
13 shall be reserved for trial.

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L E T I C I A F R A N C I N E S T I D H U M,  
a Plaintiff, having been first duly sworn by  
Ruthayn Shalom, a Notary Public of the State of  
New York, and stating her address as 2815 Murray  
Street, Flushing, New York, 11354, was examined  
and testified as follows:

MR. KATAEV: Before we begin, Counsel, we  
are going to agree to the usual federal stipulations;  
is that right?

MS. TROY: Agreed.

MR. KATAEV: For the record that is  
filing, seal and certification is waived.  
Objections except as to form are reserved for  
trial. The examination may be sworn to before  
any notary public. A copy of the transcript  
will be sent to the attorney representing the  
witness, correct?

MS. TROY: Correct. So we are clear,  
pursuant to Federal Rules of Civil Procedure  
30E, I'm going to ask that you provide a copy  
of the transcript to review it and list any  
changes to be made.

MR. KATAEV: No problem.

EXAMINATION BY

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2 MR. KATAEV:

3 Q Good morning. My name is Emanuel Kataev.  
4 I'm the attorney for the Defendants in this case  
5 which are 161-10 Hillside Auto Ave., LLC, Hillside  
6 Auto Mall, Inc., Ishaque Thanwalla, Andris Guzman,  
7 Jory Baron, and Ronald M. Baron. From here on in I  
8 will refer to 161-10 Hillside Auto Ave. as Hillside  
9 Auto Outlet, okay? I need a yes or no, please.

10 A Yes.

11 Q I will refer to Hillside Auto Mall, Inc.  
12 as Hillside Auto Mall, okay?

13 A Yes.

14 MS. TROY: If you're referring to the  
15 corporation as the corporate entity, if you  
16 could say the entire name so there is no  
17 confusion.

18 MR. KATAEV: No, that's exactly what I'm  
19 not doing. I will be referring to it according  
20 to the short name that I provided.

21 MS. TROY: To the extent that the witness  
22 has any confusion, I suggest that, you know,  
23 you read out the whole name.

24 MR. KATAEV: You will have that with Rule  
25 30E so you will be good to go. Hillside Auto

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2 Outlet is 161-10, Hillside Auto Mall is  
3 Hillside Auto Mall. I will decide how I ask  
4 the questions.

5 BY MR. KATAEV:

6 Q Jory Baron, I will refer to him as Jory,  
7 okay?

8 A Yes.

9 Q Ishaque Thanwalla I will refer to as  
10 Isaac, okay?

11 A Yes.

12 Q Andris Guzman I will refer to as Andris,  
13 okay?

14 A Yes.

15 Q Ronald M. Baron I will refer to as  
16 Mr. Baron or Ronald, okay?

17 A Yes.

18 MS. TROY: Excuse me, if both Jory and  
19 Ronald are Mr. Barons, I would suggest that you  
20 use the full name and not Mr. Baron.

21 MR. KATAEV: I will primarily use Ronald.  
22 I will decide how I ask the question.

23 BY MR. KATAEV:

24 Q I will be asking you and you will be  
25 answering questions today about yourself, the

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2 Defendants, your complaint and other related  
3 subjects; do you understand?

4 A Yes.

5 Q Your testimony today is subject to the  
6 same oath and the same penalty of perjury as if you  
7 were testifying in court; do you understand that?

8 A Yes.

9 Q We are here today concerning your  
10 discrimination case, today?

11 A Correct.

12 Q You filed a separate wage and hour action  
13 as well, correct?

14 A Yes.

15 MR. KATAEV: To the extent that any  
16 questions are asked or overlap into the other  
17 case, Defendants are nonetheless -- reserve the  
18 right to conduct a separate deposition in that  
19 actions.

20 BY MR. KATAEV:

21 Q Have you ever been deposed before,  
22 Ms. Stidhum?

23 A No.

24 Q This is your first time?

25 A Yes.



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2 Q I'm going to go over some of the basic  
3 ground rules for a deposition so we can have a  
4 smooth and easygoing deposition, okay?

5 A Okay.

6 Q First, keep your voice loud and clear for  
7 the court reporter. Second, please answer in words.  
8 The court reporter cannot take down body gestures or  
9 mumbling. Third, allow me to complete my question  
10 before you answer and I will give you the same  
11 courtesy so as to help the court reporter to not  
12 have to write down what two people are saying at the  
13 same time. Do you understand these ground rules so  
14 far?

15 A Yes.

16 Q Fourth, if you don't understand a question  
17 tell me and I will rephrase it. However, if you  
18 answer I will assume that you understood the  
19 question, okay?

20 A Okay, yes.

21 Q I'm looking for your best recollection of  
22 events today. I realize we are going to be speaking  
23 about events that occurred in May of 2018 through  
24 January of '19 and sometimes beyond. I don't want  
25 you to guess at answers, however, I'm still entitled

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2 to your best recollection of events, okay?

3 A Okay.

4 Q You can take a break any time for any  
5 reason except if there is a question pending. You  
6 need to answer that question before we take the  
7 break, okay?

8 A Okay.

9 Q Do you understand these ground rules?

10 A Yes.

11 Q Have you consumed any drugs, alcohol or  
12 medication within the last 24 hours that would  
13 affect your ability to provide truthful testimony  
14 today?

15 A No.

16 Q Is there any reason you can think of as to  
17 why you cannot provide truthful answers to my  
18 questions today?

19 A No.

20 Q Did you prepare for today's deposition?

21 A Yes.

22 Q How did you prepare?

23 MS. TROY: Objection to the extent that it  
24 calls for any attorney/client communication.

25 Q Don't tell me anything that you said to

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2 your attorney or anything that your attorney said to  
3 you, but the fact of the conversation is  
4 permissible. You can tell me you did speak without  
5 telling me what you said.

6 How did you prepare for the  
7 deposition with that qualification?

8 A Last week we met for two to three hours.

9 Q In person?

10 A Yes.

11 Q Other than meeting in person for two to  
12 three hours, did you prepare in any way for your  
13 deposition?

14 A No.

15 Q During your meeting last week, did you  
16 review my documents?

17 A Yes.

18 Q Which documents did you review, and again  
19 same qualification, don't tell me anything that you  
20 said or anything that your attorney said to you.

21 A The documents you provided pretty much and  
22 like a spread of what was -- what I was -- the  
23 decrease in pay, I should say.

24 Q The damage calculation, correct?

25 A Yes.

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2 Q And also the almost 2,000 pages of  
3 documents mostly consisting of leads information,  
4 right?

5 A Yes.

6 Q Other than those two sets of documents,  
7 did you review anything else?

8 A No.

9 Q Did you review the complaint?

10 A I'm sorry?

11 Q Did you review the complaint in  
12 preparation for the deposition?

13 A No.

14 Q Did you ever sign any affidavit,  
15 statement, declaration or any other document under  
16 oath or affirmation concerning your employment with  
17 the dealership Hillside Auto Outlet?

18 MS. TROY: Which case are you talking  
19 about?

20 MR. KATAEV: This case.

21 A Yes.

22 Q Do you recall what that was?

23 A The interrogatories.

24 Q Okay. Other than that, do you remember  
25 signing anything else?

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A No.

Q Did you speak with or obtain statements from any other employees at Hillside Auto Outlet?

MS. TROY: Which case are you talking about?

MR. KATAEV: Any case.

A No.

Q Same question for Hillside Auto Mall?

MS. TROY: Again, now you're trying to split up the two companies. Both companies are sued.

MR. KATAEV: I'm not trying to split up anything. I'm asking a question.

BY MR. KATAEV:

Q The question is and I will repeat it: Did you speak to or obtain any statements from any employees at Hillside Auto Mall?

MS. TROY: Does that include coworkers meaning the coplaintiff in the State court case?

MR. KATAEV: I don't know. She has to tell me.

MS. TROY: You need to be clear in your question.

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2 MR. KATAEV: I think you need to look at  
3 Rule 30 and read it carefully. It says all you  
4 do is say, Objection, and the grounds therefor.  
5 If you continue with the speaking objections --

6 MS. TROY: Objection. Ambiguous.

7 MR. KATAEV: -- I'm going to call the  
8 court and I don't want to do that. I'm going  
9 to repeat the question.

10 BY MR. KATAEV:

11 Q Did you speak to or obtain statements from  
12 any other employees at Hillside Auto Mall?

13 A Yes.

14 Q Who did you obtain statements from?

15 A David, I mean -- but are we talking about  
16 Hillside Auto Outlet and Auto Mall as one? It's  
17 kind of confusing.

18 MS. TROY: I'm going to ask that you use  
19 the full name of the company, sir. I think  
20 it's getting confusing.

21 MR. KATAEV: It's not confusing.

22 161-10 is Hillside Auto Outlet.  
23 Hillside Auto Mall is Hillside Auto Mall. Please  
24 stop violating Rule 30.

25

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BY MR. KATAEV:

Q The question is: Who is David?

A David Manrique.

Q Are you saying that David Manrique is an employee of Hillside Auto Mall?

A No.

Q You can clarify. Go ahead.

A So if we are talking about Hillside Auto Mall specifically, then no.

Q When I asked you earlier, did you obtain any statements from other employees at Hillside Auto Outlet, do you want to clarify your answer?

A David Manrique.

Q Other than David Manrique, did anyone else provide any statements?

A No.

Q What statement did David Manrique provide you?

A It's not a statement. It was more a conversation we had.

Q Was it written down in any way?

A No.

Q Was it a text message or email?

A No.

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2 Q He didn't sign something swearing under  
3 penalty of perjury, XYZ?

4 A No.

5 Q What did you and David discuss?

6 A Just, like, the status of the case.

7 Q That's because David Manrique is a  
8 coplaintiff with you in a State court wage and hour  
9 action, correct?

10 A Correct.

11 Q Against the same defendants here, correct?

12 A Right.

13 Q Other than your attorney, did you speak  
14 with anyone else about your deposition today?

15 A No.

16 Q Did you tell anyone you would be doing a  
17 deposition today?

18 A No.

19 Q You said you didn't review the complaint  
20 in preparation for the deposition. Did you review  
21 the complaint in general ever?

22 A Yes. When it was first submitted. It was  
23 quite some time ago.

24 Q You verified its contents before it was  
25 filed, correct?



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2 A Yes.

3 Q Have you had any conversations with anyone  
4 other than your attorneys in preparation for during  
5 your deposition?

6 A No.

7 Q Have you had any conversation with anybody  
8 else other than your attorneys and David Manrique  
9 about your case against the dealership?

10 A No.

11 Q What is every name that you ever used or  
12 gone by, other than Leticia Francine Stidhum?

13 A Letty.

14 Q L-e-t-t-y?

15 A Yes.

16 Q Any other names?

17 A No.

18 Q The current address that you provided at  
19 the beginning of the deposition, do you rent or own?

20 A Rent.

21 Q Who do you live with?

22 A My mother and stepfather and my two  
23 children.

24 Q How old are your children?

25 A One and three.

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2 Q What is your birthdate?

3 A My birthdate?

4 Q Correct.

5 A XX-XX-1998.

6 MS. TROY: I'm going to ask that  
7 everything except the birth year be marked as  
8 confidential.

9 MR. KATAEV: We have a confidentiality  
10 agreement in this case?

11 MS. TROY: I don't believe so, but I'm  
12 going ask that any filings to court have her --  
13 again, everything other than her birth year  
14 redacted consistent with the local rules of the  
15 Eastern District of New York and on the  
16 transcript itself, everything other than the  
17 birth year be marked as confidential.

18 MR. KATAEV: I don't believe that's the  
19 way it works. The rule provides if you file  
20 something publicly, you redact that  
21 information. It doesn't entitle you to mark it  
22 confidential, it just gets redacted. We will  
23 follow the rule.

24 BY MR. KATAEV:

25 Q Were you born in the United States,

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Ms. Stidhum?

A Yes.

Q When is the last time you left the country?

A September of 2020.

Q Prior to that time and focusing on the timeframe of March 2018 until January of '19, did you leave the United States of America?

A No.

Q Same question, did you leave the State of New York?

A Could you clarify the timeframe again?

Q Sure, no problem. The timeframe again, May 2018 through January of '19.

A I don't believe so. Again, it was a long time ago so I don't want to answer dishonestly.

Q Are you currently married?

A No.

Q Were you ever married?

A No.

Q Your children currently live with you?

A Yes.

Q You've lived in New York all your life?

A No.

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2 Q Where did you live prior to living in  
3 New York?

4 MS. TROY: Objection as to timeframe.  
5 Could you clarify what timeframe you're talking  
6 about.

7 MR. KATAEV: Her whole life, her whole  
8 life.

9 A Florida.

10 Q Were you born in Florida?

11 A Yes.

12 Q When did you move to New York?

13 A I have been back and forth pretty much my  
14 whole life. I did some school there, some school  
15 here. So it's kind of a hard question.

16 Q Understood. When is the last time you  
17 went to Florida and came back to New York,  
18 timeframe?

19 A Like to live?

20 Q Yes.

21 A I want to say June of 2018 or -- no, June  
22 of 2017.

23 Q Is when you left to Florida?

24 A When I came back to New York.

25 Q After returning from Florida in June of

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2 '17, when is the next time you went back to Florida,  
3 if ever?

4 A For vacation only pretty much.

5 Q When was that?

6 A I don't remember exactly.

7 Q Month and year?

8 A I have gone back quite a couple of times.

9 Honestly, I don't remember.

10 MR. KATAEV: We will follow up in writing  
11 with an interrogatory about -- to the extent  
12 you were in Florida at any point in time for  
13 the period of May 2018 until January of '19, we  
14 would want to know what dates you were in  
15 Florida, but we will follow up in writing. You  
16 don't have to answer now.

17 (Counsel Request.)

18 A These times I didn't go to Florida.

19 Q You know that for a fact?

20 A Yes, almost positive.

21 Q Have you ever been arrested before?

22 A Yes.

23 Q Have you ever been convicted of a crime?

24 A Yes.

25 Q When did that happen?

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2 A Some time in 2017.

3 Q Without going into too much detail, do you  
4 remember the charges against you?

5 A Not specifically. It was for marijuana.  
6 I don't know exactly the actual charge name, but it  
7 was for marijuana.

8 Q Were you charged with anything to do with  
9 truthfulness?

10 A No.

11 Q Other than that, are there any other  
12 charges or convictions for you?

13 A No.

14 MR. KATAEV: I'm going to present you with  
15 a document we will mark as Defendant's  
16 Exhibit A.

17 (Defendant's Exhibit A, Marked for Identification.)

18 BY MR. KATAEV:

19 Q I will represent to you this is a matter  
20 of public record. It's a document from the  
21 Kissimmee Police Department.

22 MS. TROY: I'm going to object to this  
23 document. I have never been presented this  
24 document prior to this deposition.

25 MR. KATAEV: You never asked for this.

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2 It's a public document.

3 Q At the top of the exhibit --

4 MS. TROY: Sir, I have never been -- I  
5 have never seen this document. Could you email  
6 this document to me?

7 MR. KATAEV: Sure, no problem. I will  
8 email it to you, not that I have to do so  
9 during the deposition, but as a matter of  
10 courtesy.

11 Let the record reflect that I sent  
12 the record.

13 BY MR. KATAEV:

14 Q Putting the exhibit back up, I have some  
15 questions about it.

16 MS. TROY: We are going to ask for a quick  
17 break. I have not seen the document before. I  
18 ask that I review the document before you ask  
19 questions.

20 MR. KATAEV: You have no right to the  
21 document before, you didn't ask for it in  
22 discovery. We are going to ask some questions  
23 and then you can take your break.

24 BY MR. KATAEV:

25 Q At the top it says, Description uttering

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2 forged instruments. What does it mean to your mind  
3 uttering forged instruments?

4 MS. TROY: Objections. Calls for a legal  
5 conclusion. The witness can answer to the  
6 extent she knows the answer to the question.

7 Q You can answer the question, go ahead.

8 A I'm sorry, repeat your question again.

9 Q You told me that you were arrested for a  
10 marijuana-related offense, correct?

11 A Right.

12 Q In 2017, correct?

13 A Right.

14 Q This document, which is a public record,  
15 says on December 8th of 2017, you were arrested for  
16 uttering forged instruments; do you see that?

17 A Yes.

18 Q My question to you is: What is this  
19 about?

20 MS. TROY: Objection. Calls for  
21 self-incrimination. I'm going to direct her  
22 not to answer to the extent you're asking about  
23 the questions underlying the facts of the case.

24 MR. KATAEV: Are you pleading the Fifth?

25 MS. TROY: Correct.



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2 MR. KATAEV: Let the record reflect the  
3 Plaintiff has pled the Fifth.

4 BY MR. KATAEV:

5 Q To clarify, though, is this one in the  
6 same arrest and conviction or is this a separate  
7 arrest and conviction from the marijuana?

8 A So honestly, this was a long time ago. I  
9 was really not sure. I was kind of pushed into that  
10 charge so I don't know how to answer that.

11 Q We will take you're pleading the Fifth.

12 MR. KATAEV: Do you still want to take  
13 your break now, Counselor?

14 MS. TROY: Yes.

15 MR. KATAEV: Go ahead. Take your break.  
16 Let's meet at 10:05.

17 Let the record reflect that Plaintiff's  
18 counsel and Plaintiff left without confirming  
19 when we are returning. We are meeting back at  
20 10:05.

21 (Whereupon, a short recess was taken.)

22 MR. KATAEV: We are back on at 10:05.

23 MS. TROY: Emanuel, I'm going to caution  
24 you that the document production request calls  
25 for all documents you intend to use. To the

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extent that you did not produce a document that is part of the document production request, I don't think you're entitled to use it.

MR. KATAEV: You're wrong. I objected and you didn't follow up in a motion to compel and you were denied your motion to compel in that regard.

Can we proceed?

MS. TROY: I understand that you're trying to --

MR. KATAEV: We are not here to discuss your objections. This is my deposition. I want to move on. Can we move on?

MS. TROY: I understand. I'm going to make a quick record. I'm going to make it clear to the record that I requested this as part of the document request. Mr. Kataev did not produce the document as part of the document production request.

MR. KATAEV: That's correct. I objected and you failed to follow up in a motion to compel and you already lost your motion to compel in that regard. We are moving on.

MS. TROY: That is incorrect.

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2 MR. KATAEV: You can take it up with the  
3 court. I'm going to proceed with my  
4 deposition.

5 BY MR. KATAEV:

6 Q Ms. Stidhum, other than this lawsuit and a  
7 State court wage and hour lawsuit with Mr. Manrique,  
8 have you ever been a party to any other lawsuit as a  
9 plaintiff or defendant?

10 A No.

11 Q These are the only two lawsuits you have  
12 ever been a part of?

13 A Yes.

14 Q Have you ever filed a complaint against  
15 any of your employers with any administrative agency  
16 ever?

17 A Yes.

18 Q Which agency did you file a complaint  
19 with?

20 MS. TROY: If she knows.

21 MR. KATAEV: Don't coach the witness. You  
22 either say, Objection, and the grounds they are  
23 for or nothing. Do not say, If she knows.  
24 You're coaching her to say, I don't know, I  
25 don't abide by that. I'm going to call the

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2 court. It's not proper conduct.

3 BY MR. KATAEV:

4 Q Please answer the question.

5 A If I'm not mistaken, the EEOC.

6 Q Other than the EEOC, did you ever file a  
7 complaint with any other administrative agency?

8 A No.

9 Q Thank you. Just for the record, the  
10 complaint you filed with the EEOC relates to the  
11 same defendants here, correct?

12 A Yes.

13 MS. TROY: Objection. It's not a  
14 complaint.

15 MR. KATAEV: It's just, Objection to form.  
16 You don't say, It's not a complaint. Stop with  
17 the speaking objections, okay?

18 BY MR. KATAEV:

19 Q Have you ever filed for unemployment?

20 A Yes.

21 Q Against which employer did you file an  
22 unemployment claim for?

23 A Luxury Motor Club.

24 Q That's after your left your employment  
25 with the defendants, correct?

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2 A Right.

3 Q Have you ever filed a claim for workers'  
4 compensation?

5 A No.

6 Q Have you ever applied for food stamps?

7 A Yes.

8 Q When was the most recent time?

9 A Currently I have them.

10 Q For the record, to apply for food stamps,  
11 you have to provide information about your income,  
12 correct?

13 A Correct.

14 Q You provided that information about your  
15 income, correct?

16 A Right.

17 Q Did you ever apply for Medicare or  
18 Medicaid?

19 A Yes.

20 Q You currently have that as well, right?

21 A Right.

22 Q In order to obtain Medicare/Medicaid, you  
23 also have to provide information about your income,  
24 correct?

25 A Yes.

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2 Q You did provide that information, correct?

3 A Yes.

4 Q Have you ever applied for childcare  
5 assistance?

6 A I'm not sure.

7 MR. KATAEV: We will follow up in writing.

8 (Counsel Request.)

9 BY MR. KATAEV:

10 Q What about housing assistance?

11 A Yes.

12 Q You currently have that as well?

13 A Yes.

14 Q Again, you have to provide information  
15 about your income for that, right?

16 A Yes.

17 Q You did provide that information, correct?

18 A Correct.

19 Q To the extent that food assistance is  
20 different from food stamps, did you ever apply for  
21 that benefit?

22 A I don't think so.

23 Q What about educational assistance?

24 A No, I don't think so.

25 Q Did you attend high school?

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2 A Yes.

3 Q Where?

4 A Florida.

5 Q Name?

6 A Gateway High School, but that's not where  
7 I graduated from.

8 Q Where did you graduate?

9 A Alco. I got my GED.

10 Q Which schools, if any, did you attend here  
11 in New York for high school?

12 A Flushing High School and Benjamin Cardozo.

13 Q You didn't get a high school diploma, you  
14 got a GED, correct?

15 A Correct.

16 Q Did you ever attend any college?

17 A No.

18 Q Did you have gap in your education during  
19 high school?

20 A No.

21 Q There is no graduate or professional  
22 school, correct?

23 A No.

24 Q What about vocational school?

25 A No.

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2 Q Are you familiar with dealership  
3 certification programs?

4 A Not really.

5 Q Are you aware, for example, that if you  
6 sell Ford vehicles that Ford offers certification  
7 programs for salespeople?

8 A Yes.

9 Q Have you ever taken any of those kind of  
10 courses?

11 A No.

12 Q Were those offered to you at any of the  
13 dealerships you worked for?

14 A No, I mostly worked for used car lots.

15 Q Used car lots generally don't offer those?

16 A No.

17 Q After you got your GED in Florida, is that  
18 the first time you started working?

19 A I'm not sure.

20 Q Do you recall whether you ever worked  
21 during high school?

22 A I don't believe so. No, I didn't.

23 Q After you got your GED, where was the  
24 first place you remember working?

25 A McDonald's.



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2 Q Do you remember the month and year you  
3 started there?

4 A No idea.

5 Q After you worked at McDonald's, where did  
6 you work?

7 A I can't remember that far back. I want to  
8 say it might have been Dollar Tree.

9 Q The McDonald's that you worked at, was it  
10 in Florida or New York?

11 A Florida.

12 Q What about Dollar Tree?

13 A New York.

14 Q Do you remember the month and year you  
15 started at Dollar Tree?

16 A I don't.

17 Q Did you get fired from McDonald's?

18 A No, I quit.

19 Q Why?

20 A I was being young and stupid kind of.

21 Q Understood. What about Dollar Tree?

22 A I quit there too actually.

23 Q Where did you work after Dollar Tree?

24 A That's when I got the interview with Isaac  
25 after that. No, I'm sorry, that's not true. I

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actually worked at Marco LaGuardia Hotel.

Q Hotel?

A Yes.

Q What position did you work?

A Housekeeping.

Q That was at the airport?

A No. That's right here off of Main Street,  
Northern Boulevard.

Q Is that close to where you lived at the  
time?

A Yes.

Q Is that close to where you live now?

A Pretty much. Ten-minute drive.

Q Do you remember the month and year you  
started working at the hotel?

A I don't. I didn't stay there very long.

Q After the hotel is when you first started  
working for Hillside Auto Outlet, correct?

A Correct.

Q You started working at Hillside Auto  
Outlet in May of '18, correct?

A Yes.

Q Hillside Auto Outlet was the first -- was  
the first automobile business that you ever worked

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2 in, correct?

3 A Yes.

4 Q Therefore, you had no experience in the  
5 automobile industry prior to that time, correct?

6 A Correct.

7 Q You worked at Hillside Auto Outlet from  
8 May of '18 until January of '19, correct?

9 A Right.

10 Q Although you are also suing Hillside Auto  
11 Mall, you never directly worked at Hillside Auto  
12 Mall as an employee, correct?

13 A I kind of need that question clarified  
14 because I have sold cars at Hillside Auto Mall.

15 Q Let me try. I'm going to give you a very  
16 long question of what I understand to be the case  
17 and you will confirm what's accurate and what's not,  
18 okay?

19 A Okay.

20 Q You came to work as a salesperson for  
21 Hillside Auto Outlet and worked at Hillside Auto  
22 Outlet and was paid by Hillside Auto Outlet from May  
23 of '18 until January of '19. However, during the  
24 time that you worked at Hillside Auto Outlet, you  
25 sometimes sold vehicles that were kept or maintained

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2 by Hillside Auto Mall; is that correct?

3 A Yes.

4 Q During the time you worked at Hillside  
5 Auto Outlet, you sometimes sold vehicles located at  
6 other dealerships unrelated to Hillside Auto Outlet  
7 or Hillside Auto Mall, correct?

8 A Yes.

9 Q You're not alleging that those other  
10 dealerships that you sold vehicles for are also an  
11 employer here, correct?

12 A Right, because from my understanding  
13 Hillside Auto Outlet and Mall were kind of run by  
14 the same people.

15 Q That's the reason you included Hillside  
16 Auto Mall in this case, correct?

17 A Right.

18 Q Because, as your understanding, they are  
19 what we call in legal parlance, joint employers,  
20 correct?

21 A I'm sorry, one more time.

22 MR. KATAEV: Read it back.

23 (Whereupon, the referred to question was read back  
24 by the reporter.)

25 MS. TROY: Objection to the extent it

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2 calls for a legal conclusion.

3 BY MR. KATAEV:

4 Q You can answer. Go ahead.

5 A I'm not sure.

6 Q Okay, that's fine. Your employment with  
7 Hillside Auto Outlet ended in January of '19,  
8 correct?

9 A Correct.

10 Q That's because you quit, correct?

11 A Yes.

12 Q During the time you worked at Hillside  
13 Auto Outlet, your sole position or job title was  
14 salesperson, correct?

15 A Right.

16 Q Your primary responsibility was selling  
17 cars, correct?

18 A Right.

19 Q Any other responsibilities that you had?

20 A Um, not necessarily responsibilities, no.

21 Q Who were your supervisors while you worked  
22 at Hillside Auto Outlet?

23 A Isaac was one, Jay or Jenneque, she was  
24 another for a short period of time, a couple of  
25 months. Andris Guzman and that was about it as far

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2 as supervisors, yes.

3 Q Can you describe basically what your  
4 compensation structure was there?

5 A So in the beginning when I was first hired  
6 after interviewing with Isaac and speaking with  
7 Jenneque, I was told I would be paid \$300 weekly,  
8 \$150 flat, and after anything over \$3,000 I would  
9 receive 5 percent, and it is reflected on my  
10 paystubs for the first couple of months up until Jay  
11 was fired or quit. I don't know what happened in  
12 that situation. Then, I started just receiving the  
13 \$150 flat.

14 Q Let's say the schedule that you worked was  
15 generally Monday to Friday, correct?

16 A No.

17 Q What was your schedule like?

18 A So I had Wednesdays off and we would work  
19 alternating Sundays.

20 Q You either worked five days a week or six  
21 days?

22 A Correct.

23 Q And so do you know what the actual work  
24 week was? Did they do it Monday through Sunday or  
25 did they do it Saturday through Friday?

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2 A I have no idea. I know that I received my  
3 check Thursdays.

4 Q The check that you received on Thursdays  
5 was for the entire prior week, correct, whatever the  
6 week was?

7 A Yes.

8 Q How did you go about verifying that you  
9 got paid properly on any given week?

10 A So weekly we would get a form that has  
11 like three pieces together, so -- for copies, and we  
12 would have to turn it into the sales manager and  
13 they would give it to the girl who does the payroll.

14 Q Who was that?

15 A There was a couple. From the beginning,  
16 it was -- I can't remember who it was in the  
17 beginning. I know it ended with Denise doing my  
18 payroll, Denise and Iris. There was a couple of  
19 people in between.

20 Q Does Dianna Jennings ring a bell?

21 A No.

22 Q Dina Jennings?

23 A Dina, I didn't really meet because she was  
24 hardly ever there. I've probably seen her three or  
25 four times.

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2 Q Let's break down the compensation. \$300 a  
3 week is the flat \$300 a week, right?

4 A Salary.

5 Q The \$150 per car is for every car you  
6 sold, correct?

7 A Yes.

8 Q In order for the car to be considered  
9 sold, it had to be delivered, right?

10 A Right.

11 Q Which means the customer took possession  
12 of the vehicle and all the funds had been received  
13 from the bank and all of that, right?

14 A I mean yes and no because there would be  
15 times that I would still get paid on all the cars  
16 even if it was not funded. It's a yes-and-no  
17 answer.

18 Q In terms of getting paid for vehicles that  
19 were not funded, did it sometimes happen that you  
20 did not get paid on a vehicle that hasn't been  
21 funded yet?

22 A One more time.

23 Q Was it sometimes the case that a vehicle  
24 was not funded and you didn't get paid on it?

25 A Yes. That happened a couple of times but



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2 relatively quickly with the funding, they would do a  
3 pretty good job of that.

4 Q They would like to take care of you while  
5 you worked there, correct?

6 MS. TROY: Objection to form.

7 Q You can answer.

8 A I guess.

9 Q When they paid you for a vehicle that  
10 hasn't been funded yet, they did so in their  
11 discretion, correct?

12 A It would be something that I wasn't aware  
13 of. It might have happened, it might have happened.  
14 I'm not sure. I'm not looking at the back end of  
15 the dealership.

16 Q You don't care whether it's funded or not,  
17 you want to get your commission, right?

18 A Of course.

19 Q How would you keep track of the vehicles  
20 that you sold in any given week?

21 A With that same form. I would do that  
22 monthly.

23 Q Did you ever take pictures of that form on  
24 your cellphone?

25 A No, because I would have the copies so it

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2 wasn't something that I really needed to take  
3 pictures of.

4 Q Have you produced those copies in this  
5 case?

6 A No, because I don't think anybody plans to  
7 be mistreated or anything like that to hold on to  
8 stuff like that.

9 Q What you're saying is you never held on to  
10 those documents?

11 A No. After I would get paid, I would  
12 discard them.

13 Q The reason you discarded them was because  
14 you were satisfied that you were properly paid,  
15 correct?

16 A I don't know how to answer that question.

17 Q Answer to the best of your ability.

18 A I mean, if I'm getting paid on the deal  
19 there is no reason for me to hold on to it.

20 Q You threw it out because you were  
21 satisfied that you were properly paid, right?

22 MS. TROY: Objection. Argumentative.

23 Q You can answer.

24 MS. TROY: Objection. Asked and answered.

25 Q I would like to hear the answer.

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2 MS. TROY: Because you don't like the  
3 answer doesn't mean you can ask it again. The  
4 witness can answer again.

5 BY MR. KATAEV:

6 Q Go ahead.

7 A I'm sorry.

8 Q The reason why you threw out the document  
9 was because you were satisfied that you were paid  
10 properly, correct?

11 A Yes, up until I was owed money. Up until  
12 I was shorted on my commissions.

13 Q How did you come to be aware that you were  
14 owed money or that you were short on the  
15 commissions?

16 A Because I know what I'm owed to start. I  
17 would know how many cars I would sell weekly and  
18 what I'm owed weekly. Again, I was getting paid  
19 that \$150 flat so it wasn't something that -- it  
20 wasn't a mystery to solve. Of course I know what  
21 I'm looking forward to expecting especially upon  
22 leaving somewhere.

23 Q Going through the 5 percent bonus, can you  
24 explain that in your own words?

25 A It wasn't a 5 percent bonus. It was

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2 anything paid over -- any deal that made over \$3,000  
3 because at 5 percent, \$3,000 would be \$150.  
4 Anything that made over that, I was receiving that  
5 extra compensation up until Jay was fired and it  
6 does reflect it on my paystubs.

7 Q Jay is the person that you referred to as  
8 Jenneque, correct?

9 A Yes.

10 Q So when you say \$3,000, you're saying  
11 that's what the vehicle sold for?

12 A No. That's what the deal made.

13 Q The gross profit?

14 A Right.

15 Q When is it that Jay was no longer at the  
16 company?

17 A I'm not quite sure. It had to be at the  
18 end of July or sometime in August. It was sometime  
19 in the summer I remember.

20 Q At some point after July or August of  
21 2018, you no longer got that 5 percent, correct?

22 A Correct.

23 Q You continued your employment with the  
24 dealership, correct?

25 A Yes.

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2 Q Did anyone inform you they are no longer  
3 offering the 5 percent in July or August?

4 A No.

5 Q Did you come to anyone and say, What  
6 happened to the 5 percent?

7 A I did mention it and it was kind of  
8 brushed off.

9 Q Who did you mention it to?

10 A Isaac.

11 Q What did Isaac say to you?

12 A I don't recall.

13 MR. KATAEV: Off the record.

14 (Whereupon, an off-the-record discussion was held.)

15 BY MR. KATAEV:

16 Q You testified that you quit in January of  
17 '19, right?

18 A Correct.

19 Q What was the reason that you quit?

20 A It was a combination of things between the  
21 pregnancy discrimination, being owed money and not  
22 paid it. It was a couple of things. Also, I was  
23 promised a position that I guess I wasn't receiving  
24 due to my pregnancy, so like I said, it was a  
25 combination of things.

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2 Q We are going to get into the pregnancy  
3 discrimination position you talked about a little  
4 later. I want to focus on the compensation aspect  
5 and I have some more granular questions about your  
6 decision to quit related to those financial aspects  
7 so I'm going to focus in on that for now.

8 A Okay.

9 Q Did you quit because you stopped receiving  
10 the 5 percent?

11 A No.

12 Q Did you quit because of waiting times?

13 A Yes. That's what one of the factors.

14 Q Tell me about the waiting times?

15 A So like I mentioned a couple of times, I  
16 did have my own access to Dealertrack and once Isaac  
17 did go on vacation, the password was changed and  
18 Guzman was the supervising manager at the time and  
19 he refused to give it to me. So that did increase  
20 my waiting times because I was not able to qualify  
21 my customers on my own and they would leave.

22 Q Assuming you were able to qualify your  
23 customers, that doesn't necessarily mean you would  
24 make the sale, correct?

25 A Right.

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2 Q It only increased the chances of making  
3 the sale, correct?

4 A Not necessarily increases it, but it gives  
5 me the opportunity to see who I'm wasting time on  
6 and who I'm not wasting time on. We were in Jamaica  
7 so we would get a lot of customers that did not  
8 qualify.

9 Me having my own access to Isaac's  
10 Dealertrack would give me the ability to qualify my  
11 customers on my own rather than waste time on  
12 somebody and wait on Andris or Isaac or whoever to  
13 check the credit.

14 MR. KATAEV: Can I have the last question  
15 and answer read back?

16 (Whereupon, the referred to testimony was read back  
17 by the reporter.)

18 BY MR. KATAEV:

19 Q You acknowledge, however, that you were  
20 the only salesperson that had access to Dealertrack  
21 to qualify individuals, correct?

22 A Yes.

23 Q All the other salespeople did not have  
24 that ability that you did for some time, correct?

25 A That I know of at least.

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2 Q Generally, it was the responsibility of an  
3 F&I manager or someone else in the dealership, other  
4 than a salesperson, to qualify individuals, correct?

5 A Not just an F&I. The general manager or  
6 sales manager, I don't know their titles exactly,  
7 but they have access as well.

8 Q Those individuals are not salespeople,  
9 correct?

10 A Right.

11 Q You say that you obtained access to  
12 Dealertrack, right?

13 A I was given it, yes.

14 Q Who gave it to you?

15 A Isaac.

16 Q How did he give it to you?

17 A Honestly, I don't remember because, like I  
18 said, the password would be changed after a certain  
19 period of time because it's sensitive information.  
20 They would change the password, but he would put it  
21 on a sticky note or he would come to my desk and  
22 type in the password himself. He was the only one  
23 giving me the password.

24 Q The username for the Dealertrack account,  
25 whose was it?



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2 A It was Isaac's. I never had anybody  
3 else's.

4 Q You didn't have your own, correct?

5 A I did not.

6 Q After you quit working at Hillside Auto  
7 Outlet, where did you work next?

8 A NYC Motor Cars.

9 Q Where is that?

10 A Queens Boulevard.

11 Q Did you start working there in January of  
12 '19 or some other point?

13 A I'm not sure if I waited until the start  
14 of February or not, so I'm not 100 percent sure. It  
15 was definitely early that year.

16 Q In January or February of '19, correct?

17 A Probably more towards the end of January  
18 or beginning of February.

19 Q In order to begin a job there, you had to  
20 fill out an employment application?

21 A I actually did not.

22 Q 1,000 percent sure you didn't?

23 A An application?

24 MS. TROY: Objection as to form.

25 Q You can answer.

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2 MS. TROY: What do you mean by  
3 1,000 percent sure? Objection to form.

4 MR. KATAEV: I'm not going to qualify that  
5 with a response. You can answer the question.

6 MS. TROY: Rephrase your question, sir.

7 BY MR. KATAEV:

8 Q Please answer the question as asked.

9 A Repeat it.

10 Q Are you 1,000 percent sure you did not  
11 fill out any employment application at NYC Motor  
12 Cars?

13 A I don't remember filling one out. I was  
14 brought there by a sales manager that Isaac had  
15 working with him.

16 Q Who was that?

17 A Ali.

18 Q When you say you can't remember, you can't  
19 remember one way or the other, correct?

20 A What do you mean?

21 Q You can't remember whether you did fill  
22 out an employment application or not?

23 A Right. I was brought there by someone  
24 else. He was kind of like, You don't have to be  
25 interviewed, you don't have to do this, just come.

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2 Q Do you know Ali's full name?

3 A I'm not sure how to spell it. Ali  
4 Raskesnia, something like that.

5 Q When you started working at NYC Motor  
6 Cars, it was a new dealership?

7 A Not that I know of.

8 Q Was your compensation structure there the  
9 same as it was at Hillside Auto Outlet?

10 A No.

11 Q What was the compensation structure there?

12 A The commission was doubled.

13 Q In other words, it was \$300 per car?

14 A Yes.

15 Q It was the same \$300 weekly draw?

16 A Yes. Not draw, it was salary.

17 Q Thank you for clarifying. There was no  
18 5 percent bonus?

19 A No, but I did have a monthly bonus  
20 structure.

21 Q Based on volume, correct?

22 A Correct.

23 Q When did you stop working at NYC Motor  
24 Cars?

25 A When I gave birth.

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2 Q When was that?

3 A In July. I stayed, like, a week up until  
4 I gave birth so maybe July of 20-something.

5 Q 2020?

6 A 2019.

7 Q I see what you're saying. 20-something  
8 meaning the day?

9 A Yes.

10 Q Congratulations by the way.

11 A Thanks.

12 Q You were there at NYC Motor Cars for  
13 approximately six months, correct?

14 A Right, and I did go back.

15 Q When did you return?

16 A I want to say like October, September,  
17 October around there.

18 Q Are you still employed there?

19 A No, I'm not.

20 Q When did you cease working there?

21 A About a month or two after I actually left  
22 because the store was completely different,  
23 employees were different, it was not doing the  
24 volume it was and I became a BDC manager at Luxury  
25 Motor Club.

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2 Q Business development center?

3 A Yes.

4 Q You ceased working at NYC Motor Cars in or  
5 about November or December of 2019, correct?

6 A Yes.

7 Q You quit?

8 A I'm sorry?

9 Q You quit?

10 A Yes, I did.

11 Q You went to Luxury?

12 A Motor Club.

13 Q Where is that?

14 A In Franklin Square.

15 Q How did you obtain the position there?

16 A Probably on Indeed or something. Some  
17 type of employment ad.

18 Q When did you start there?

19 A Mid November of 2019.

20 Q Are you still working there?

21 A No, I'm not.

22 Q When did you stop working there?

23 A When Covid hit. March, early March. I  
24 got Covid really bad. I decided to leave and not  
25 get my kids sick.

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1 L. Stidhum

2 Q Did you return to the workforce after  
3 March 2020?

4 A I did.

5 Q When was that?

6 A Actually, the owner of NYC Motor Cars  
7 called me that he was opening a new store so I don't  
8 remember the exact time, but he told me he was  
9 opening a new store and he wanted me to run the  
10 store that I worked at on Queens Boulevard. I don't  
11 remember the exact month and date.

12 Q If I understand correctly, the owner of  
13 NYC Motor Cars was opening a new store and needed  
14 your help with his existing store at NYC Motor Cars?

15 A Correct.

16 Q Did you go back to NYC Motor Cars?

17 A I did as a sales manager.

18 Q Do you remember what month in 2020 it was?

19 A I don't. It was probably maybe late  
20 April, early May, around there.

21 Q That's fine. Are you still there?

22 A No, I'm not.

23 Q When did you stop work there?

24 A I don't remember the exact timeframe. I'm  
25 not sure. I was trying to think.

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1 L. Stidhum

2 Q Where are you working now?

3 A I'm not working.

4 Q When did you stop working?

5 A I gave birth last year. I took off pretty  
6 much since January of last year.

7 Q January of 2022?

8 A Right. I did work at a dealership for a  
9 couple of weeks. It didn't work out. It was super  
10 slow.

11 Q Which dealership was that?

12 A Great Neck Motor Sports.

13 Q Is that on Great Neck Road?

14 A Yes.

15 MR. KATAEV: Off the record.

16 (Whereupon, an off-the-record discussion was held.)

17 BY MR. KATAEV:

18 Q Other than the last job at NYC Motor Cars  
19 as a sales manager and the job at Great Neck Motor  
20 Sports, did you work anywhere else after April of  
21 2020?

22 A Yes, I did. NY Luxury Motors, but again  
23 it was a bad situation there. It was in a bad spot  
24 and the dealership wasn't getting any traffic at  
25 all, so I decided to leave and look for other

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1 L. Stidhum

2 employment elsewhere.

3 Q Were you fired from any of these jobs we  
4 talked about today?

5 A No, I was not.

6 Q At any of these jobs, did you ever fill  
7 out any employment application?

8 A For Luxury Motor Club, I definitely did.  
9 Great Neck, I definitely did. The only one I can't  
10 recall is NYC Motor Cars because Ali was the one who  
11 brought me there, I don't remember. Everywhere else  
12 I did fill out an employment application.

13 Q Whenever you filled out an employment  
14 application, you did list Hillside Auto Outlet as a  
15 past experience, correct?

16 A Of course.

17 Q The only reason there are gaps in your  
18 work experience is because of the birth of your two  
19 children, correct?

20 A Right, and Covid.

21 Q When you applied for a position at  
22 Hillside Auto Outlet it was for a salesperson,  
23 correct?

24 A Right.

25 Q How was it you learned about the position?



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2 A I believe it was Craigslist and I got a  
3 call the next day.

4 Q You called based on the Craigslist ad?

5 A No. I sent in my application and got a  
6 phonecall the next day. Not my application, my  
7 resume.

8 Q When you got the call the next day, do you  
9 remember who it was?

10 A Isaac.

11 Q To the best of your recollection, how did  
12 the conversation go?

13 A I don't remember. He told me to come in,  
14 if I can come in the same day and I was kind of  
15 bummed about losing my job -- not losing my job,  
16 leaving my job at the hotel and I wanted to get a  
17 job so bad, so I went the same day that he called  
18 and got the job.

19 Q You met with Isaac in person that day?

20 A Yes.

21 Q What do you recall about your conversation  
22 with Isaac in person that day?

23 A Honestly, I don't remember. I remember  
24 him saying that he was willing to give me a shot and  
25 to wait for his partner and then I spoke with Jay.

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1 L. Stidhum

2 Q When you refer to his partner, that was  
3 Jenneque?

4 A Yes.

5 Q You also spoke with Jenneque that day?

6 A Yes, I did.

7 Q You got the job the same day?

8 A Right.

9 Q An interview took place at the dealership,  
10 correct?

11 A Yes.

12 Q At Hillside Auto Outlet, correct?

13 A Yes.

14 Q What is your understanding as to the basis  
15 for which you got hired?

16 A What do you mean by that?

17 Q Why do you believe you were hired?

18 A I'm not sure.

19 Q As far as you understood it, Isaac and/or  
20 Jenneque together made a decision to hire you,  
21 correct?

22 A I mean, Isaac already told me he was  
23 willing to give me a shot and it was more like a  
24 meeting Jay type of thing.

25 Q At the time you were hired, Andris Guzman

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1 L. Stidhum

2 was not an employee of the dealership yet, correct?

3 A He was.

4 Q He did not participate in the decision to  
5 hire you, as far as you know, correct?

6 A No, he did not.

7 Q You know that for a fact or it's as far as  
8 you know?

9 A It's as far as I know.

10 Q He did not interview you, correct?

11 A No.

12 Q At the time that you were hired, Jory did  
13 not participate in the decision to hire you,  
14 correct?

15 A No.

16 Q Jory was not present daily at the  
17 dealership, correct?

18 A Yes.

19 Q Was Jory ever present at the dealership?

20 A He was. He would pop in a couple of times  
21 a month.

22 Q Same question for Ron: As far as you  
23 know, he did not participate in the decision to hire  
24 you, correct?

25 A No.

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2 Q Was Ronald ever present at the dealership?

3 A Again, same thing. Yes, here and there.

4 Q During the times that Jory and/or Ron  
5 would visit the dealership, did you interact with  
6 either of them?

7 A Yes.

8 Q What was the nature of your interaction  
9 with them?

10 A It was more of how we were doing, how  
11 things were going.

12 Q Pleasantries?

13 A Pretty much.

14 Q Do you recall receiving a written offer of  
15 employment when you were hired?

16 A No, I did not.

17 Q Did you start work the same day you were  
18 hired?

19 A I'm not 100 percent sure. I want to say  
20 yes, but I'm not sure.

21 Q To whom did you report as soon as you  
22 started working?

23 A What do you mean to who did I report?

24 Q As a salesperson, you reported to someone  
25 higher, correct?

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2 A Right. Mostly I would go to Isaac or Jay,  
3 when I first started there at least.

4 Q You did not report to Andris Guzman at the  
5 time, correct?

6 A Not that I can really recall. Up until  
7 Jay leaving, he didn't do too much.

8 Q Jay left in July or August of?

9 A 2018.

10 Q After July or August of 2018 is when you  
11 started reporting to Andris Guzman; is that right?

12 A Correct.

13 Q You never reported to Jory, correct?

14 A Not on that aspect. Only when there was  
15 an issue.

16 Q Give me an example.

17 A Like, when I was missing some of my car  
18 pay, I did reach out to him, I called him and sent  
19 him a text message as well.

20 Q That was in January of '19 before you  
21 quit, correct?

22 A Correct.

23 Q Other than that --

24 A No, I'm sorry. It was probably after I  
25 quit, once I didn't receive the compensation after

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2 telling Isaac.

3 Q In January of '19, correct?

4 A Right.

5 Q Other than that, you never interacted with  
6 him other than pleasantries, correct?

7 A For Jory, yes, that's pretty much it.

8 Q What about Ronald, you never reported to  
9 him, correct?

10 A Right.

11 Q You had no interactions with him other  
12 than pleasantries, correct?

13 A And about the bonus situation.

14 Q When did you reach out to Ron about the  
15 bonus situation?

16 A I didn't reach out to him. He was in the  
17 store. He came in, asked how everyone was doing, he  
18 looked really happy. I mentioned -- I don't know  
19 how I worded it, but I mentioned I was pissed  
20 because I didn't get the bonus and I was only a  
21 couple of cars away, and that I was really hoping to  
22 get it because I was pregnant and stuff. That's  
23 when whatever conversation happened between him and  
24 Isaac happened. I don't know what happened after  
25 that.

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2 Q Do you remember when that was, month and  
3 year?

4 A Early December or the last two days of  
5 November, something like that. It had to be the end  
6 of November or early December.

7 Q After Jenneque left, you started reporting  
8 to Andris Guzman. What was the nature of the  
9 working relationship? What did you report to him  
10 on?

11 A So up until I got my own access --  
12 actually, I feel like it was right about the same  
13 time because Jay was pretty quick with what she  
14 would do. For the first couple of days, I had to go  
15 to him, give him the application, have him run the  
16 credit and let me know if the customer qualified or  
17 whatever the case may be. That was pretty much it  
18 up until I got my own access, then we really didn't  
19 have to do too much communicating.

20 Q From the first time you started working at  
21 the dealership initially in order to get financing,  
22 you would have to go to Jay in order to run credit  
23 and apply for financing, correct?

24 A Right. I mean, I was new to the business  
25 so I don't know much about those things up until I

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1 L. Stidhum

2 was taught it.

3 Q Fair enough. When Jay left, you continued  
4 doing that with Andris, correct?

5 A Right.

6 Q Let's set aside for now the Dealertrack.  
7 I have some questions about this process before you  
8 got the Dealertrack access.

9 When you worked with Jay to get these  
10 financing applications in, was Jay the exclusive,  
11 only person that did this?

12 A No.

13 Q Sometimes you worked with others, correct?

14 A Yes. Isaac would do it as well.

15 Q Other than Isaac and Jay, was there anyone  
16 else that did it?

17 A Later on there was a finance manager hired  
18 after Jay left.

19 Q Who was that?

20 A Serge.

21 Q Serge came on after?

22 A Yes.

23 Q After Jay left?

24 A Yes.

25 Q In the beginning, it was Isaac or Jay and



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2 that's it, correct?

3 A Correct.

4 Q How did you go about deciding who to go  
5 to?

6 A Whoever was less busy. I was always  
7 trying to grab whoever I could. Whoever was less  
8 busy is who I would go it.

9 Q After Jay left, you had the option of  
10 Andris or Isaac, correct?

11 A Right, and I would choose Isaac more of  
12 the time because he was quicker. Andris was getting  
13 trained to do that part. Once Jay left, he was kind  
14 of taking over her position.

15 Q Jay left in August or July of '18. Do you  
16 remember in relation to that when Serge started?

17 A It had to be like end of August because I  
18 remember there was a couple of people that came to  
19 interview and stuff so it had to be after but I'm  
20 not sure exact dates.

21 Q Whenever you went to Isaac or Jay in the  
22 beginning to run financing applications for  
23 customers of the dealership, prospective customers  
24 of the dealership, there would sometimes be delays  
25 caused because the banks wanted more information,

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1 L. Stidhum

2 correct?

3 A Yes and no.

4 Q Explain.

5 A I mean, when it comes to any delays in  
6 banks, it would be because of a document that they  
7 needed, but for the most part, you would have all  
8 the documents. It was in our sales procedure to get  
9 ID, the most recent two paystubs and that proof of  
10 address if needed. It's kind of hard to answer that  
11 question because, for the most part, they would have  
12 everything needed.

13 Q To the extent a customer did not have  
14 something that was needed, that would delay the  
15 process, correct?

16 A Yes.

17 Q Is it not true that sometimes individuals  
18 are self-employed and don't necessarily have things  
19 like paystubs?

20 A Of course.

21 MS. TROY: Objection. Argumentive.

22 Q You can answer.

23 A I mean, yeah.

24 Q In those situations when you submit the  
25 applications there would be a delay, correct?

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2 A Yes.

3 Q The only way to prevent the delay from  
4 being further delayed is to obtain whatever the  
5 document is and submit it to the bank, correct?

6 MS. TROY: Objection to form.

7 Q You can answer.

8 A One more time, your question.

9 MR. KATAEV: Read it back.

10 (Whereupon, the referred to question was read back  
11 by the reporter.)

12 A Yes.

13 Q Sometimes the customer would not have that  
14 information handy the same day, correct?

15 A Yes.

16 Q Sometimes the customer would never return  
17 with the information at all, correct?

18 A Correct.

19 Q This rings true from the beginning when  
20 you worked with Jay and Isaac, to the end when you  
21 were working with Andris, Isaac and Serge, correct?

22 A Right.

23 Q Towards the end of your employment  
24 relationship with Hillside Auto Outlet, you had the  
25 ability to go to either Isaac, Andris or Serge to

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2 run financing applications, correct?

3 A Correct.

4 Q You're telling me that Andris was the  
5 individual who caused you purposefully to wait  
6 longer than everyone else, correct?

7 A I'm sorry. I got to run back a little  
8 bit. Serge would not run credit. He would if he  
9 was not busy, but for the most part, it was the  
10 sales manager or the general manager's job to run  
11 the credit and follow up with the customer prior to  
12 giving it to the finance manager to not waste his  
13 time.

14 So, yeah, Serge did not run the  
15 credit. It was mostly up to Isaac and Guzman to run  
16 the credit because Serge would really just submit  
17 the deal to the banks.

18 Q Understood. What you're saying generally  
19 is that, in terms of who you could go to after Jay  
20 left, it was really just Isaac and/or Andris,  
21 correct?

22 A Yes.

23 Q It was very rare that Serge would run the  
24 credit?

25 A Yes.

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2 Q Okay.

3 MR. KATAEV: Can we have the original  
4 question read back?

5 MS. TROY: For the record, Mr. Kataev has  
6 been coughing throughout this morning.

7 MR. KATAEV: It's a moot point. You don't  
8 need to make these stupid things on the record.

9 MS. TROY: I don't appreciate you calling  
10 my stuff stupid.

11 MR. KATAEV: You achieved what you wanted.  
12 We are in a remote deposition. What is the  
13 point? Don't interrupt the deposition.

14 MS. TROY: I was concerned for my client  
15 and my health, and it was perfectly valid  
16 because you told me you'd be asymptomatic by  
17 Friday.

18 MR. KATAEV: I said other than a minor  
19 cough, but it's a moot point. Please don't  
20 interrupt my deposition.

21 (Whereupon, the referred to question was read back  
22 by the reporter.)

23 A Yes. Isaac left probably the first week  
24 of December, something like that so yes, that's  
25 partially the reason why I had extended wait times

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1 L. Stidhum

2 because he did not want to give me the access I had  
3 before.

4 Q Isaac never caused you to wait longer like  
5 Andris did, correct?

6 A Correct.

7 Q Neither did Serge in the rare circumstance  
8 when you would go to him, correct?

9 A Correct.

10 Q Your complaint says that the only  
11 reason -- withdrawn.

12 Your complaint says that Andris only  
13 caused you to wait longer to run the financing  
14 applications after you had disclosed to him and  
15 others that you were pregnant, correct?

16 A That's how it seemed, yes.

17 Q When you disclosed to individuals that you  
18 were pregnant, you did so at the dealership,  
19 correct?

20 A Yes.

21 Q Who was present when you told everyone the  
22 great news?

23 A I mean, all the salespeople were present.  
24 I was a few minutes late, I remember that because I  
25 came in and everyone was there and I was waving my

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2 sonogram picture around. I don't remember if Isaac  
3 was there when I got there and said it or not, but I  
4 know definitely Guzman was there and I did tell  
5 Isaac later that day when he came in for sure.

6 Q I want to understand. When you first said  
7 it, who was immediately in your circle or presence?

8 A Guzman was there because he would sit at  
9 the podium so he was front and center. David was  
10 there, I remember Sean being there, he was another  
11 salesperson, the other David, I don't remember his  
12 last name, I believe it starts with a P. I don't  
13 believe Serge was there just yet. He usually came a  
14 little later. I'm not sure if Isaac was there yet  
15 but I know that same day I did show him the  
16 sonogram.

17 Q When you made that announcement, did  
18 Andris say anything to you?

19 A I don't recall.

20 Q Do you recall him saying congratulations?

21 A I don't.

22 Q Do you recall anyone else saying  
23 congratulations?

24 A Yes. The other salespeople were looking  
25 at it together. Everybody was, like, excited for

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2 me, I guess I could say.

3 Q Did Andris make any statements at all  
4 during that conversation?

5 A I honestly don't think so. He didn't have  
6 much personality, I want to say. I don't feel like  
7 he said anything to me.

8 Q Prior to the time that you announced your  
9 pregnancy to him and to the others, did you and  
10 Andris have any interpersonal conflicts with each  
11 other?

12 A Honestly, yes, we did, but it was -- we  
13 kept it professional. We worked in a professional  
14 environment. We kept it professional.

15 Q What was the nature of the interpersonal  
16 conflict that you had?

17 A Honestly, I don't remember.

18 Q It was all work-related, of course?

19 A Yes.

20 Q Maybe you had some disagreement or  
21 argument about something relating to a sale,  
22 correct?

23 A Yes, definitely work-related. Nothing  
24 personal, I don't think.

25 Q Did any of your interpersonal conflicts



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2 with each other rise to a level at any point before  
3 you announced your pregnancy where someone else had  
4 to get involved and mediate you two?

5 A Not that I recall, no.

6 Q Whatever happened between you two, you  
7 sort of water-under-the-bridge type of thing?

8 A Pretty much.

9 Q How many times did that happen prior to  
10 the time that you announced your pregnancy?

11 MS. TROY: Objection to form. Ambiguous.

12 Q You can answer the question.

13 A Honestly, I don't remember. It's probably  
14 once or twice. Nothing like crazy where we hated  
15 each other and couldn't speak. It was nothing like  
16 that.

17 Q You had two little squibbles here and  
18 there?

19 A Yes.

20 Q Do you recall whether those two incidents  
21 were close in time to the time that you learned were  
22 pregnant?

23 A I don't remember, no.

24 Q It could have been at the beginning, it  
25 could have been at the middle, or it could have been

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2 towards the end when you learned you were pregnant?

3 A As far as after my pregnancy announcement,  
4 I definitely remember what transpired. In those  
5 little hiccups we had, I don't remember when, no.

6 Q Andris was one who never directly made any  
7 comments to you about your pregnancy, correct?

8 A Not that I remember, no.

9 Q In terms of the two incidents you had  
10 prior to the time you learned you were pregnant, did  
11 you have similar incidents after the fact?

12 MS. TROY: Objection. Ambiguous.

13 Q You can answer.

14 A I don't recall.

15 Q One way or the other, correct?

16 MS. TROY: Objection. Ambiguous.

17 Q You can answer.

18 A I don't know what you mean by, One way or  
19 the other.

20 Q It could have happened that you two had a  
21 little argument or it could not have happened, you  
22 don't remember either way?

23 A Honestly after announcing my pregnancy,  
24 there wasn't much arguing. It was more like I was  
25 doing a lot of crying and upset, so I can't really

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2 say that yes one way or the other.

3 Q When you say you cried, did you cry  
4 physically in front of Guzman?

5 A Absolutely. Multiple times, and in front  
6 of Isaac as well.

7 Q When you cried in front of Guzman, what  
8 happened?

9 A Nothing, absolutely nothing. He would  
10 have no emotion.

11 Q Did he ask why you were crying?

12 A No.

13 Q Your job responsibilities at the  
14 dealership never changed, correct?

15 A No.

16 Q Are you currently living with the father  
17 of your children?

18 A No.

19 Q The father of your children is not in any  
20 way related to Hillside Auto Outlet, correct?

21 A No.

22 MS. TROY: We are going to strike any  
23 irrelevant questions and answers after the  
24 deposition.

25 MR. KATAEV: Feel free to make that motion

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2 whenever you're ready, but don't do it during  
3 the deposition.

4 BY MR. KATAEV:

5 Q You never had any relationship with Andris  
6 Guzman outside of work, correct?

7 A Absolutely not.

8 Q The compensation rate that you had, other  
9 than the 5 percent bonus after Jay left, remained  
10 the same, correct?

11 A I'm sorry, what was that?

12 Q The compensation structure that you  
13 outlined to me, other than the 5 percent bonus going  
14 away after Jay left, remained the same, correct?

15 A Yes.

16 Q You sold a car, you got an extra \$150,  
17 correct?

18 A Yes.

19 Q That bonus was not discretionary, correct?

20 A No. It took me months to get it.

21 MS. TROY: I don't think she understood  
22 your question honestly.

23 Q When you say it took you months to get it,  
24 what did you mean?

25 A It took me months to get a bonus in

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2 general.

3 Q Right. The 5 percent type of bonus,  
4 right?

5 A No. That wasn't a bonus. That was  
6 something promised upon being hired. The bonus was  
7 something that came of the blue because I was, like,  
8 at 20 cars in the middle of the month and he was  
9 like, If you hit 30, I will give you an extra  
10 thousand.

11 Q When you say it took you months to get it,  
12 you mean it was only offered to you after working  
13 months at the dealership?

14 A Correct.

15 Q Your duties remained the same from May of  
16 '18 until January of '19, correct?

17 A Yes.

18 Q Your pay remained the same except for the  
19 5 percent issue from May of '18 to January of '19,  
20 correct?

21 MS. TROY: Objection. Asked and answered.  
22 She may answer again.

23 A Yes.

24 Q The 5 percent change occurred prior to  
25 your pregnancy, correct?

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2 A Yes.

3 Q Your position remained the same from May  
4 of '18 until January of '19, correct?

5 MS. TROY: Objection to form. Asked and  
6 answered twice, but she may answer again.

7 A Yes.

8 Q Were you ever disciplined at Hillside Auto  
9 Outlet for any work-related issue?

10 A No, not that I recall.

11 Q Were you ever suspended from work?

12 A No, I was not.

13 Q Did you ever receive a performance  
14 evaluation?

15 A No.

16 Q What was the most number of cars that you  
17 sold in a given week?

18 A I want to say like seven to -- honestly, I  
19 don't recall but the records will show exactly, but  
20 I know it was definitely more than seven.

21 Q In your understanding, were you in any way  
22 the top salesperson at the dealership?

23 A I was.

24 Q At all times?

25 A Yes, up until December of 2018.

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2 Q When Andris started making you wait longer  
3 in December of '18, did you confront him about it?

4 A Yes, I did. I did ask him why is he  
5 making my customers wait longer. I would constantly  
6 press the issue of, What's going on with this  
7 customer, or he would constantly tell me, You have  
8 to wait, you have to wait, there's other people  
9 here, and I'm like, it wasn't like this. These  
10 people are getting antsy and it happened on multiple  
11 occasions that I would have these conversations with  
12 him.

13 Q He never said anything to you about your  
14 pregnancy during those conversations, correct?

15 A I mean, not that I can recall. What is  
16 there to say?

17 Q To your knowledge, is Andris Guzman  
18 married?

19 A I have no idea.

20 Q To your knowledge, does Andris Guzman have  
21 children?

22 A No clue.

23 Q What basis do you have to believe that  
24 Andris Guzman made you wait longer solely because of  
25 your pregnancy?

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2 A It happened only right after I announced  
3 my pregnancy, that would be the first reason why,  
4 and not to mention, like I said before, he was my  
5 point of contact once Jay was fired so I can tell  
6 the difference in, you know, from that time and  
7 after I announced my pregnancy.

8 It wasn't -- I had customers waiting  
9 so long after Jay quit. From that time after my  
10 pregnancy, I know it's clear as day that that's what  
11 was going on. I was a top saleswoman at a point and  
12 I went from being the top salesperson to being the  
13 one with the least cars out. It doesn't add up.

14 Q Isn't it true that December is a slow time  
15 of the month for selling cars because it's cold out?

16 A I wouldn't say because it's cold out. I  
17 honestly believe we sold a lot of cars, anywhere  
18 between 45 to 60 cars a month. Sometimes even  
19 exceeded 65 cars, so it's kind of hard to say  
20 because if I'm not mistaken, yes, November we sold  
21 the most cars but the month prior to that we  
22 probably sold the same amount of cars in that store  
23 as December.

24 Q How would you know or keep track of the  
25 number of cars sold in total through the dealership?



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2 A We had a board in Serge's office that we  
3 would keep track of how many sales everybody had.  
4 So each salesperson's name would be up there and we  
5 would put like a tally mark and keep track of all  
6 the sales. I always wanted to make sure I was  
7 number one so I would always be the one keeping  
8 track of that board.

9 Q It's true, isn't it, that prior to your  
10 pregnancy, Andris Guzman would frequently keep  
11 customers waiting longer than necessary, correct?

12 A I don't believe that to be correct. Isaac  
13 was every involved and it felt like it was something  
14 he did once he saw that Isaac wasn't looking over.  
15 He would always be very active in our daily routine.  
16 He would ask us, What's going on with this customer,  
17 greet the customers and do things like that. I  
18 can't say that that's entirely true, no.

19 Q I will place up on the screen what will be  
20 marked as Defendant's Exhibit 2. I will represent  
21 to you, Ms. Stidhum, that this is the complaint that  
22 was filed in this case. I'm going to scroll up to  
23 show the header of page six for your esteemed  
24 counsel's edification.

25 (Defendant's Exhibit B, Marked for Identification.)

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BY MR. KATAEV:

Q I want to focus your attention on the following paragraphs.

A Can I review the entirety of the document before answering anything?

Q You know what, we can take a break for you to do it. Your esteemed lawyer has a copy of the complaint, I'm sure. So we are going to take a quick break. It's 11:14. We will get back on at 11:30.

A Okay.

Q That way you will be ready to answer any questions. I will tell you that my questions, for the record, are solely at this point related to paragraphs 35 through 38, okay?

A All right.

Q I will leave it up on the screen for you.

MR. KATAEV: We are going to take a break.

Off the record. Back at 11:30.

(Whereupon, an off-the-record discussion was held.)

BY MR. KATAEV:

Q Back on the record. Ms. Stidhum, welcome back. I want to ask you before we get back into the questions, during the break, did you have an

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2 opportunity to review the complaint in full?

3 A Not in full. I skimmed through it.

4 Q During this break and the break before  
5 that, without divulging any of the actual  
6 conversations you had, did you discuss your  
7 testimony with your counsel?

8 A No.

9 Q Okay. My question was: Isn't it true  
10 that even prior to the time that you disclosed your  
11 pregnancy, Andris Guzman would take a long time with  
12 prefilling financing applications for customers?

13 A So yes, that is partially true, that's why  
14 I said that before. He was just getting into Jay's  
15 role at the dealership so he was still kind learning  
16 the ropes so that's why Isaac saw I was pretty fast  
17 with the computer. He sat down with me in his  
18 office and showed me how to run credit.

19 You're transferring information from  
20 paper to the computer, so he did give me my access  
21 at that point, but of course over time, we are  
22 talking four months later that we went back to this.  
23 Of course over time, Guzman learned how to navigate  
24 through it a little quicker but at the time I  
25 announced my pregnancy, it doesn't make sense why he

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2 would backtrack, if you get what I'm saying.

3 Q I understand that. That's a fair  
4 explanation. It's true, is it not, that throughout  
5 the time once Guzman learned how to do everything  
6 properly, he generally would take 20 minutes to  
7 handle these applications?

8 A More or less.

9 Q Your complaint is that after you disclosed  
10 your pregnancy, it would take anywhere from 40 to 60  
11 minutes, correct?

12 A Right or longer.

13 Q You allege in your complaint that as a  
14 result of the longer wait times that we just  
15 discussed, most of your customers would walk out and  
16 not complete their purchase, correct?

17 A Yes.

18 Q How do you know that it's because of the  
19 wait times that they decided to walk out?

20 A Generally, we are the ones who would go  
21 back to them and tell them, You don't qualify, or  
22 You need X amount of dollars down or you can't get  
23 this car, you would need that car. It would be a  
24 conversation between the sales manager and the  
25 salesperson.

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2 They wouldn't really want to jump  
3 into the deal unless they had to, so it's like, I  
4 wouldn't get to speak to my sales manager or if I'm  
5 like, Hey, hold on, my sales manager got something,  
6 at this point, they are frustrated, they are walking  
7 out the door.

8 Q Did any customers actually tell you, We  
9 don't want to purchase anything from you because it  
10 took you too long to get back to us?

11 A Yes, it happened a couple of times.

12 Q Do you remember the names of any of those  
13 individuals?

14 A I don't. I have gone through hundreds,  
15 maybe thousands of customers, I don't.

16 Q Are you familiar with the lead management  
17 system at the dealership?

18 A Lead management system? The CRM that was  
19 used?

20 Q CRM meaning customer relationship  
21 management, right?

22 A Yes.

23 Q You're familiar with that program?

24 A Yes.

25 Q That program is used to track every single

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2 potential customer that comes in and whether or not  
3 it results in a sale, correct?

4 A Not necessarily correct. The business  
5 development center would focus on their appointments  
6 because that's what they're paid on. They are not  
7 paid on walk-in customers, so any walk-in customers  
8 are not all accounted for. I can't say that's  
9 completely true.

10 Q How many walk-in customers in a month do  
11 you think come in that are not accounted for?

12 A Honestly, Saturdays or the weekend were  
13 our busiest time because we on a main strip,  
14 Hillside has a bunch of dealerships. I would say  
15 it's like a 40/60 or 50/50 because that weekend  
16 volume is equivalent to the whole week's worth of  
17 volume. I can't really say how many customers.

18 It was almost equal because of where  
19 we were. Location is everything in this business.  
20 We had dealerships in front of us, beside us, down  
21 the street from us. We would have customers leaving  
22 one spot to come to us that didn't have an  
23 appointment. I can't put a number on it.

24 Q Your testimony today is that walk-ins were  
25 not accounted for in the CRM system?

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2 A Not every single one. Sometimes they  
3 would log them in, sometimes I would not see them  
4 logged in.

5 Q What be the reason for not logging someone  
6 in versus logging them in?

7 A I can't say. I didn't work in that  
8 department. I would say it's laziness.

9 Q Are you speaking from your subsequent  
10 experience as a BDC manager?

11 A Yes.

12 Q Paragraph 53 of the complaint, you said in  
13 December and January of '18 and '19, you would  
14 constantly call Guzman to ask how long customers  
15 would wait; do you see that?

16 A Yes.

17 Q When you say call, do you mean physically  
18 with the cellphone?

19 A No. I mean call over to him. He was at a  
20 podium. Our desks were diagonal from each other.

21 Q What would happen when you would ask  
22 Guzman how long?

23 A He would tell me I would have to wait,  
24 that there are other customers here.

25 Q Did you observe at the same time that this

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2 was happening that Andris Guzman would help a  
3 different salespeople out and provide information?

4 A Yes. There was multiple occasions where I  
5 would see that a customer came in after my customer  
6 and he still hasn't touched the application or the  
7 folder was still sitting up top.

8 Q With which salespeople did that occur with  
9 that you can recall?

10 A It happened with Sean because me and Sean  
11 were kind of, I wouldn't say on the same level. He  
12 was a little bit of my competition at a point. And  
13 David Parsons, and David Manrique also witnessed it  
14 because he was selling more cars than me, and he was  
15 kind of not the best salesperson, I would say. He  
16 was always second-to-last or last. It was something  
17 that everybody kind of witnessed.

18 Q During this time, Isaac was out on a  
19 month-long vacation?

20 A Correct.

21 Q That's the reason why you couldn't go to  
22 Isaac to assist you with certain applications,  
23 correct?

24 A Yes.

25 Q Did you attempt to go to Serge to run



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2 applications instead of with Andris Guzman?

3 A Yes, I did. It's -- kind of plays each  
4 other hand in hand because Guzman's job was to run  
5 the credit and if Serge was overwhelmed, he would  
6 submit the application. So whatever credit that  
7 Guzman did run was already at Serge, and he's like,  
8 I'm busy, I can't do this right now, you have to  
9 give it to Guzman, you have to wait on Guzman, so  
10 that's what I had to do.

11 Q Whenever a sale was made, you would  
12 receive a commission, correct?

13 A Yes.

14 Q To your knowledge, similarly, Serge would  
15 also receive a commission, right?

16 A Yes.

17 Q To your knowledge, what about Guzman, was  
18 he not also entitled to a commission?

19 A He was.

20 Q Is it your testimony that Andris Guzman  
21 purposely made you wait such that he suffered and  
22 didn't get commissions on sales?

23 MS. TROY: Objection. Argumentative.

24 Q You can answer.

25 A Honestly, it's hard to answer that because

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2 it's, like, I can't really understand why he would  
3 put himself in that position either because one  
4 person wins, we all win. He didn't really care. He  
5 took on whoever he felt he wanted to take on first.

6 Q Do you believe that he prioritized other  
7 salespeople over yours because he felt that those  
8 customers that those salespeople had were more  
9 qualified?

10 A It's hard to answer that question. There  
11 is no way to qualify a customer by looking at them.  
12 If he's not running my credit, how is he going to  
13 make that argument?

14 Q Isn't it true that sometimes people who  
15 work at dealerships stereotype customers and make  
16 assumptions about their creditworthiness by looking  
17 at them?

18 A As being in a sales manager position, I  
19 learned that that's not the way to properly manage.  
20 I have seen people come in raggedy with 800 credit  
21 scores and \$10,000 to put down on a car, and some  
22 people that dressed flashy and don't have anything  
23 or don't even have a piece of credit. I can't make  
24 that argument because, as a sales manager in  
25 previous dealerships, I would never do that.

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2 Q You have seen other people make those  
3 stereotypes, correct?

4 A Again, I can't really say yes or no.

5 Q Fair enough. You spoke with Isaac when he  
6 returned from vacation in January of '19?

7 A Yes.

8 Q What was your conversation with him? What  
9 did you say to him and what did he say to you?

10 A I told him what was going on. I showed  
11 him the amounts of cars I have out and he didn't  
12 really understand what was going on either. And I  
13 was promised that when he would return that I was  
14 going to be promoted to sales manager, so I was  
15 trying to hang in there.

16 So when he came, I did ask him, I was  
17 like, Look, if you have no desire promoting me as  
18 sales manager, then I don't really feel that I want  
19 to work here anymore unless you're going to give me  
20 more of my commission and not put me as a sales  
21 manager, and he kind of didn't have any answer for  
22 it, he said we would talk about it later.

23 At that point, I was tired of being  
24 given the runaround and not making money. As a  
25 pregnant woman and being 19 years old, it's hard to

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2 be put in that position and not be scared. Like, I  
3 was 19 years old having my first kid and I'm getting  
4 played at this place I thought I was going to grow  
5 with. I can't really -- it didn't make sense for me  
6 to stay there any longer at that point.

7 Q To your knowledge, is Andris Guzman still  
8 employed at this dealership?

9 A I have no idea. I don't speak to them.

10 Q To clarify, your testimony as to the basis  
11 for your belief that Andris Guzman made you wait  
12 longer solely because of your pregnancy was just  
13 because it happened that you waited longer after you  
14 disclosed your pregnancy than before, correct?

15 A I'm sorry, one more time.

16 MR. KATAEV: Read it back, please.

17 (Whereupon, the referred to question was read back  
18 by the reporter.)

19 MS. TROY: Objection to form.

20 BY MR. KATAEV:

21 Q You can answer.

22 A That's not correct. There is more to it.  
23 It wasn't just the longer wait period. He obviously  
24 had Isaac's access to Dealertrack as well and he  
25 refused to give me the password. Like, he didn't

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feel the need to, and not to mention the decrease in my sales played a part in Isaac not wanting to promote me to sales manager as well. It goes hand in hand as to why I believe it was pregnancy discrimination.

Q You're alleging, as far as I understand, that Andris Guzman was the only person who discriminated against you based on your pregnancy, correct?

MS. TROY: Objection. Calls for a legal conclusion.

A Not really. I do believe Isaac kind of discriminated against me as well by not promoting me. It is what it is at that point, but he did not do anything to fix the issue. He did not -- the promotion can be taken away from anyone so I can't hold it to that, but I do believe it had something to do with my pregnancy as well because it was something I was promised and was working towards getting.

I texted him while he was on vacation. He responded but told me he would handle it at a later time which I get it, you're on vacation with your family.

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2 Q With respect to the promotion, when was  
3 the first time that was a discussion?

4 A It was sometime in November. We were  
5 talking about it because he was preparing for us for  
6 his vacation for a month. He was kind of the dad of  
7 the dealership so he was watching over everything,  
8 he made sure everything stayed afloat.

9 It was definitely sometime in  
10 November and he told me when he got back, we would  
11 discuss it and go over what exactly was going to  
12 happen at that point, but this is way before the  
13 pregnancy discrimination and everything.

14 Q This is before the pregnancy announcement?

15 A Right.

16 Q Who was the sales manager at that time?

17 A It was -- at that time, it was kind of  
18 weird because Guzman was the sales manager slash  
19 finance or whatever, he was kind of doing both.  
20 It's a hard question to answer because then he  
21 brought in Ali while he was gone. It was just a  
22 mess. I can't really answer that question  
23 truthfully. It was Guzman and Ali for a short  
24 period of time.

25 Q And so the discussion was that when Isaac

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2 returned in January of '19, there would be  
3 discussion about who is going to fill the role of  
4 sales manager, correct?

5 A Pretty much.

6 Q Was the discussion that you would  
7 definitely become sales manager?

8 A Yes. It wasn't a discussion of who would  
9 fill the role. It was him telling me he was going  
10 to make me the sales manager and that was pretty  
11 much his purpose of showing me how to run credit and  
12 read credit because he was the one that told me how  
13 to do both. It's a whole bunch of numbers and  
14 lines. It's not something that you can understand.

15 Q When Isaac returned in January of '19,  
16 what was the next discussion had about the sales  
17 manager position?

18 A I told him if he had no desire to promote  
19 me, then I wanted a raise or I would leave because I  
20 was offered that position by Ali making double the  
21 commission.

22 Q What did he say in response?

23 A I don't recall. I remember him saying we  
24 will talk about more at a later time. I was fed up  
25 at that point because how much more time do you want

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2 me to waste not making money.

3 Q The truth is you didn't wait for a  
4 decision, correct?

5 A It felt like his answer was kind of clear  
6 as day. If he wanted to give me that position, he  
7 would have given it to me at that point.

8 Q He didn't expressly tell you, I'm not  
9 giving you the position, correct?

10 A I don't recall.

11 MR. KATAEV: Off the record.

12 (Whereupon, an off-the-record discussion was held.)

13 BY MR. KATAEV:

14 Q We are going to continue.

15 Andris Guzman did not have any  
16 authority to discipline you in any way, correct?

17 A Not that I know of.

18 Q Andris Guzman did not have the power to  
19 fire you, correct?

20 A Not that I know of.

21 Q Andris Guzman did not have the power to  
22 change your pay, correct?

23 A No.

24 Q Andris Guzman did not have the power to  
25 change the terms and conditions of your employment,



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2 correct?

3 A No.

4 Q Okay. Did you ever tell Andris Guzman, I  
5 think you're doing this because I'm pregnant?

6 A I want to say yes, if I'm remembering  
7 correctly. I do believe I made that statement, yes.

8 Q What was his response?

9 A Honestly, he was a very unemotional  
10 person. Like, he would look at you with blank eyes.  
11 I don't believe I got any response out of him.

12 Q That's the way he was towards everybody,  
13 correct?

14 A Yes, for the most part.

15 Q Was anyone else present when you  
16 confronted him?

17 A I don't recall.

18 Q Did you confront him at the podium?

19 A Most likely.

20 Q Did you complain to Isaac that you felt  
21 that the actions being taken against you were  
22 because of your pregnancy?

23 A I'm not sure if I used the words to my  
24 pregnancy, but I told him that ever since I  
25 announced it, that this -- XY and Z has been

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2 happening.

3 Q What was his response?

4 A Honestly, I don't remember. I feel like  
5 it was more of, We will talk when I get back, and no  
6 talk happened.

7 Q What about the fact that you had to wait  
8 longer for applications to be done makes you believe  
9 it was discriminatory?

10 A I'm sorry, one more time.

11 Q What about the fact that you had to wait  
12 longer for certain customer applications made you  
13 believe it was discriminatory?

14 A Like I said before, I worked with him for  
15 months now and I have seen, you know, his growth in  
16 the business, I have seen when he was not very good  
17 and very, very slow. Like, I watched him grow in  
18 the business so for him to backtrack after my  
19 announcement it doesn't really make any sense.

20 Q Did anyone at Hillside Auto Outlet make  
21 any statements to you that you believe suggest  
22 discrimination?

23 A Yes. Ali and David and actually, I did  
24 have somebody working there at the time who was a  
25 friend of mine who would always try to calm me down

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2 when I would get upset or cry about the situation.

3 And she was like, Yeah, ever since this happened and  
4 ever since you announced your pregnancy, this has  
5 been going on.

6 Q What is that person's name?

7 A Brianna.

8 Q What did Ali say to you that made you  
9 believe it was a suggestion of discrimination?

10 A He was kind of telling me about this  
11 position he was offering so I didn't have to deal  
12 with this.

13 Q Other than that, anything else?

14 A Not that I can recall. It was more him  
15 telling me that I wouldn't have to deal with these  
16 types of things.

17 Q What about David Manrique?

18 A He told me that it's clear, because I  
19 mean, his numbers were where my numbers usually were  
20 so it's clear what was going on. He actually  
21 thought that it may be a strategy to get me out  
22 sooner because they knew I would not be able to work  
23 at a certain point.

24 Q Why do you believe the dealership cared  
25 that you wouldn't be able to work at a certain

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2 point?

3 A I was bringing in the most numbers. We  
4 hit milestones that they never hit before me working  
5 there. They sold more cars than they sold prior to  
6 me working there.

7 Q As a business, wouldn't the dealership  
8 want to maximize the amount of sales before you  
9 left?

10 MS. TROY: Objection. Argumentative.

11 Q You can answer.

12 MS. TROY: Rephrase your question.

13 Q I'm not rephrasing. You can answer.

14 A One more time.

15 MR. KATAEV: Read it back.

16 (Whereupon, the referred to question was read back  
17 by the reporter.)

18 A Of course. I would believe that too but  
19 again, it's not something that was done by the whole  
20 dealership. It was something done by an individual,  
21 so I mean, it was more of a personal thing against  
22 me while being pregnant.

23 Q And personal on whose part, Andris  
24 Guzman's, right?

25 A Right, and also not to mention there was

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2 somebody who was working there that was pregnant in  
3 the DMV department and she was pregnant and she was  
4 probably there not even a week after -- let me  
5 rephrase that.

6 She left maybe a week or even sooner  
7 than a week of me working there, after me working  
8 there, and I remember her storming out upset, so I  
9 have reason to believe this might be a strategy used  
10 to get out pregnant women.

11 Q What was that employee's name?

12 A Lily. I don't remember her last name.

13 Q What about Brianna, did she make any  
14 statements that you believe suggested  
15 discrimination?

16 A Brianna was more a comforting friend,  
17 like, I think this is going on because you're  
18 pregnant. Maybe they want to get somebody else in  
19 to fill your place and stuff like that.

20 Q You realize that one you gave birth and  
21 went out on leave, the dealership would hire a  
22 salesperson to take your place during that time?

23 A Of course. That's why it doesn't make  
24 sense to me why things would go this way.

25 Q You're saying that Andris Guzman was

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2 behind all of this?

3 A Yes, and partially Isaac as well.

4 Q Are there any documents that you believe  
5 suggest discrimination?

6 A I mean, it's more verbal so I can't say  
7 documents besides my paystub that show the decrease  
8 in pay of four to \$500 a week.

9 Q Any other documents?

10 A Not that I can think of.

11 Q Why do you believe the paystubs suggest  
12 discrimination?

13 A It shows a drastic decrease in my pay.

14 Q You're saying that your paystubs show  
15 consistent amounts and they don't fluctuate up and  
16 down?

17 A Not necessarily consistent, that's not  
18 what I said. It's within those timeframes I did --  
19 my pay did drop. Of course the first couple of  
20 months I was still getting the hang of things and  
21 learning the ropes. In between that time, I was  
22 capitalizing at being a salesperson. It was most  
23 money I ever made at that time.

24 Q We are going to get into the paystubs.

25 Was there any other event or

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2 circumstance that you believe was discriminatory?

3 A There was more than one instance where I  
4 had to say something to Guzman about my customers'  
5 waiting and stuff like that. This is years ago, so  
6 I can't say word for word.

7 Q I understand. Other than what you  
8 testified about so far, can you identify all the  
9 other times that you claim you were discriminated  
10 against?

11 MS. TROY: Excuse me, sorry.

12 MR. KATAEV: Read it back, please.

13 (Whereupon, the referred to question was read back  
14 by the reporter.)

15 A Again, it wasn't something -- it was more  
16 work-related than anything. The longer wait times  
17 is not something that I can pinpoint.

18 Q Is it fair to say that the complaint lists  
19 all instances of discrimination against you?

20 A No.

21 Q Same question with respect to your  
22 interrogatory responses?

23 A I'm sorry.

24 Q Fair to say that your interrogatory  
25 responses list all instances of discrimination

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2 against you?

3 A No, because I mean, it's a general period  
4 so I can't say that everything is written there.

5 Q Do you believe that you were treated less  
6 favorably than other employees?

7 A At that point, yes.

8 Q That's even though you were given special  
9 access to Dealertrack that no other salesperson was?

10 MS. TROY: Objection. Argumentative.

11 Q You can answer.

12 A Repeat the question.

13 (Whereupon, the referred to question was read back  
14 by the reporter.)

15 A So I mean, of course up until my  
16 announcement, yes. It's not just that Dealertrack  
17 was taken away. It was the decrease in my pay.

18 MR. KATAEV: Let the record reflect that  
19 every time Plaintiff's counsel has objected, I  
20 observe a lot of glances towards the screen and  
21 other indications that there is something going  
22 on.

23 MS. TROY: Objection to that whole line.

24 MR. KATAEV: If it's found that  
25 Plaintiff's counsel is coaching the witness by



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typing instructions or answers on the screen during the deposition, an appropriate motion will be made to sanction Plaintiff and her counsel. I'm warning you if that's what you're doing, please stop. I will obtain the forensic evidence to prove it.

MS. TROY: I'm going to object to that whole line of instruction. Completely inappropriate.

MR. KATAEV: I will be making an appropriate application for forensic evidence. The judge will not be pleased by what is found on that computer because nothing you delete from there is actually deleted. I'm just letting you know.

MS. TROY: Again, I object to that whole line.

MR. KATAEV: Okay.

My client has observed this multiple times and has noted it in notes to me, and I have observed it myself just now. I'm warning you, Counsel, if you're typing notes to her on the screen, stop doing that. It's not allowed.

MS. TROY: I'm not doing that.

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2 MR. KATAEV: Good.

3 Read back the last question.

4 (Whereupon, the referred to question was read back  
5 by the reporter.)

6 BY MR. KATAEV:

7 Q You admit, however, that when you were  
8 provided access to Dealertrack you were the only  
9 salesperson that was provided that, correct?

10 A Yes.

11 Q In that regard, you were treated more  
12 favorably, correct?

13 A Right.

14 Q Can you identify any other ways in which  
15 you were treated more favorably at the dealership  
16 while you worked there?

17 A I mean, I guess the fact of me getting the  
18 \$1,000 bonus and no one received any bonus.

19 Q Can you identify all the employees that  
20 you believe were treated more favorably than you?

21 A I mean, are we speaking after my  
22 announcement or prior to my announcement?

23 Q After the announcement.

24 A After the announcement, I can't really say  
25 anybody was treated more favorably. I can say that

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2 they were taken -- their customers were taken or  
3 tended to a little more promptly. I can't say  
4 favorably because still nobody did get Dealertrack  
5 access or bonuses or anything like that.

6 Q With respect to that answer, that's solely  
7 in relation to Andris Guzman processing the  
8 financing application, correct?

9 A Right.

10 Q It's not the case with Serge, after  
11 disclosing your pregnancy, Serge processed all the  
12 applications whether it came from you or someone  
13 else the same way, correct?

14 A Pretty much. He took them as they went.

15 Q Was there anyone else that took longer to  
16 process the financing applications with you than  
17 with anyone else?

18 A No.

19 Q That's the only way any employee was  
20 treated more favorably than you, correct?

21 A Yes.

22 Q What is your understanding as to why all  
23 the other employees were being treated more  
24 favorably than you?

25 A Again, I didn't say I was being treated

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2 favorably. I said that he would take them or tend  
3 to them more promptly.

4 Q Why do you believe he did that?

5 A Again, because I don't know if it had  
6 something to do personal or if it was with my  
7 pregnancy. It's not something that I can really  
8 answer. I don't know why he would do that. If one  
9 of us makes a sale, we all get a commission. It's  
10 not something I can really understand either. I  
11 don't know if he wanted me out of the store because  
12 I pregnant. I don't know.

13 Q Fair enough. Do you know the educational  
14 background of Andris Guzman?

15 A No. I don't know anything personal.

16 Q Do you know Andris Guzman's work  
17 experience with dealerships?

18 A No, I do not.

19 Q Do you know if he had any work experience  
20 working for any other dealership?

21 A I remember being told he worked at Major  
22 World or something. That's about it.

23 Q Do you have any knowledge about Hillside  
24 Auto Outlet's policy against discrimination?

25 A No.

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2 Q Did you ever sign any document  
3 acknowledging receipt of a policy against  
4 discrimination?

5 A I believe so. We had an employee packet.  
6 I'm pretty sure it was in there somewhere that I  
7 didn't really see.

8 Q Do you still have a copy of it?

9 A No, we weren't given a copy of it.

10 Q Fair to say that when you had a  
11 conversation with Isaac about the fact that you felt  
12 your pregnancy was playing a role in what was going  
13 on, you never really followed up and you decided to  
14 quit, correct?

15 MS. TROY: Objection to form.

16 Q You can answer.

17 A The question one more time.

18 (Whereupon, the referred to question was read back  
19 by the reporter.)

20 A I mean, at that point I wouldn't think I  
21 had to follow up with something when somebody tells  
22 me, We are going to speak about this later or, Come  
23 Monday, we are going to have a conversation. It  
24 wasn't something I felt the need to follow up on.  
25 No, I did not follow up with it. I only asked later

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2 on about my commission I was owed on cars that I did  
3 not get paid on.

4 Q Understood. Your complaint alleges that  
5 you were discriminated against on the basis of your  
6 sex or gender, correct?

7 MS. TROY: Objection. She can answer if  
8 she understand.

9 A Yes, I don't get it.

10 Q In your complaint, you say you were  
11 discriminated against, right?

12 A Yes.

13 Q What is the basis upon which you're saying  
14 you were discriminated against, on what grounds?

15 A My pregnancy.

16 Q Are you also saying you were discriminated  
17 against because of your sex or gender?

18 A I mean, doesn't that play hand in hand  
19 that only women can get pregnant?

20 Q I'm asking you: Is that reason why you're  
21 saying you were discriminated against?

22 MS. TROY: Objection. She can answer.

23 A I guess.

24 Q Are you also alleging that you were  
25 discriminated against based on disability?

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2 A I don't think being pregnant is a  
3 disability, is it?

4 MS. TROY: Objection. Also calls for  
5 legal conclusion.

6 Q I can't answer your question, Ms. Stidhum,  
7 but I will take the answer from what you provided,  
8 okay?

9 A Okay.

10 Q Do you claim that you were discriminated  
11 against on any other basis?

12 A No.

13 Q At the time you left, with respect to your  
14 pregnancy, were you showing?

15 A No. I was not even three months, I  
16 believe.

17 Q You acknowledge that Andris Guzman was not  
18 a decision-maker at the dealership, correct?

19 A Yes and no. I mean, he played a part in  
20 making decisions at some points.

21 Q The question is how?

22 A I mean, it was kind of -- it's kind of  
23 hard to say. It was a team effort. It would be  
24 something that was a conversation between whoever it  
25 was between, whether it was just management, he

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2 would definitely be involved in those decisions.

3 For the most part, yes, Isaac was the one who made  
4 decisions.

5 Q In your complaint, you seek damages of an  
6 amount over two million dollars, right?

7 A Yes.

8 MS. TROY: Objection.

9 Q You're generally seeking over two million  
10 dollars for this case, correct?

11 A Yes.

12 Q What is the basis for you seeking those  
13 damages?

14 A I'm not sure. That's something to discuss  
15 with my attorney.

16 Q Can you describe any injuries that you  
17 sustained as a result of any unlawful  
18 discrimination?

19 A I mean, besides being depressed, upset,  
20 stressed, scared even because I mean -- this is  
21 something that Isaac told me that stuck with me when  
22 I told him I was leaving. He told me the grass  
23 wasn't always greener on the other side. For the  
24 first couple of months it wasn't and I was  
25 definitely scared. Those are some of the feelings I



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2 felt.

3 Q Other than being depressed, upset,  
4 stressed and scared, did you suffer any other  
5 emotional injuries as a result of any  
6 discrimination?

7 A No, not that I can think of.

8 Q Would you say you suffered any  
9 psychological injuries as a result of the alleged  
10 discrimination?

11 A I'm not sure, but I did experience a lot  
12 of anxiety. I don't want to say one hundred percent  
13 it was from this. It could have been a combination  
14 of being pregnant and worried, but I did suffer from  
15 a lot of anxiety.

16 Q Did you suffer any physical injuries as a  
17 result of the alleged discrimination?

18 A No.

19 Q For the emotional injuries that we had  
20 just discussed, what were your symptoms, if any?

21 A I'm sorry?

22 Q What were your symptoms, if any, for the  
23 emotional injuries we just discussed?

24 A The same ones; stress, depressed, scared.

25 Q Did you seek any medical treatment or

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other healthcare for any of these injuries?

A No.

Q Were you ever hospitalized for these injuries?

A No.

Q Did you ever take any medication for any of these injuries?

A Being pregnant I can't so, no.

Q How are you now?

MS. TROY: Objection. How is this relevant? She can answer the question. It's not relevant and it's going against your seven hours.

MR. KATAEV: Just say, Objection, relevance.

BY MR. KATAEV:

Q Please answer the question.

A How am I now?

Q Correct.

A What does that mean?

Q How are you now in terms of your emotional state and the injuries you just talked about?

A Based on that it's been years now, of course I have recovered. It's been years, I got to

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2 experience a lot of great positions. Everything  
3 happens for good reasons.

4 Q Okay. Is fair to say that whatever the  
5 symptoms or injuries we talked about have now been  
6 resolved?

7 A Yes.

8 Q None of these symptoms or injuries that we  
9 discussed prevented you from working or seeking  
10 work?

11 A Partially. Even though I was able to get  
12 a job immediately after, it wasn't all peaches and  
13 cream in the beginning. I was very stressed out, I  
14 was very worried about what's going to happen and  
15 like I said, the grass wasn't greener in the  
16 beginning but of course they got better.

17 Q They got better after a few months?

18 A Maybe a few months, we will say.

19 Q What made it better after a couple of  
20 months?

21 MS. TROY: Objection as to form.

22 A Volume, of course, that was my main thing.  
23 This whole thing started from my decrease in pay. I  
24 was stressed out about money, I had bills to pay.  
25 The volume of the dealership increased definitely

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2 helped me deal with everything that was going on.

3 Q When you refer to volume you mean money,  
4 correct?

5 A The volume of customers and cars sold,  
6 yes.

7 Q The fact that you made more money  
8 alleviated the emotional injuries, correct?

9 MS. TROY: Objection. Argumentative. You  
10 can answer.

11 A Yes. I wouldn't say that making money, it  
12 was a weight off my back not having to worry about  
13 how I was going to provide for this child I was  
14 bringing into this world, yes, but I wouldn't say  
15 alleviated everything, no.

16 Q Do you receive child support?

17 A No.

18 Q Have you taken any steps to obtain child  
19 support?

20 A No.

21 MS. TROY: Objection. How is that  
22 relevant?

23 MR. KATAEV: It's relevant.

24 MS. TROY: It's not relevant.

25 MR. KATAEV: Are you instructing her not

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2 to answer?

3 MS. TROY: She may answer.

4 MR. KATAEV: Your objection is noted.

5 BY MR. KATAEV:

6 Q What was the answer to have you taken any  
7 steps to obtain child support?

8 MS. TROY: She said, No.

9 A No.

10 Q Why is that?

11 A Because I --

12 MS. TROY: Objection as to relevance. She  
13 may answer.

14 A I haven't felt the need to. My child's  
15 father helps.

16 Q How does your child's father help?

17 A He does what he has to do for our child.

18 Q He provides financially for the child,  
19 correct?

20 A Yes.

21 Q Okay. I understand now.

22 Prior to you working at Hillside Auto  
23 Outlet, have you ever sought any treatment from any  
24 mental healthcare professionals?

25 A No.

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2 Q Prior to your working at Hillside Auto  
3 Outlet, have you ever experienced any depression,  
4 being upset, stressed or being scared or having  
5 anxiety?

6 A No.

7 Q Do you use any social media websites?

8 A Yes.

9 Q Do you use Facebook?

10 A Not anymore.

11 Q What about Instagram?

12 A Yes.

13 Q What about LinkedIn?

14 A I have an account but I don't really use  
15 it.

16 Q Twitter?

17 A No.

18 Q Snapchat?

19 A Yes.

20 Q With respect to these websites, have you  
21 ever posted anything about this lawsuit on any of  
22 those four websites that you use; Facebook,  
23 Instagram, LinkedIn or Snapchat?

24 A I don't want to say no because I might  
25 have early on.

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2 Q What is an example of something you may  
3 have posted on any of those websites?

4 A Or maybe I haven't. Honestly, I'm not  
5 sure.

6 Q Did you ever post anything on Facebook  
7 about the fact that you are available to sell  
8 someone a car at Hillside Auto Outlet?

9 MS. TROY: Again, sorry.

10 MR. KATAEV: Read it back.

11 (Whereupon, the referred to question was read back  
12 by the reporter.)

13 A Are we talking after or prior to me  
14 leaving?

15 Q During the time you worked there.

16 A Probably. I would always try to advertise  
17 as best I could.

18 Q After you left, did you ever post anything  
19 about your working experience at Hillside Auto on  
20 any of those sites?

21 A I don't believe so.

22 Q Isn't it true you made a Facebook post  
23 about the fact that you're seeking two million  
24 dollars against Hillside Auto on Facebook?

25 MS. TROY: Objection. Argumentative. She

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2 may answer.

3 A I don't recall.

4 Q Isn't it true that you posted something  
5 like that and later deleted it?

6 A Can you give me a timeframe?

7 Q Some time after you left and filed the  
8 original lawsuit?

9 A Are we talking closer to the time we left  
10 or recent?

11 Q I'm not sure. Any time after you left?

12 A I don't recall.

13 Q One way or the other, correct?

14 MS. TROY: Sorry?

15 Q You don't recall one way or the other,  
16 correct?

17 A No.

18 Q Are you claiming that you're entitled to  
19 backpay in this case?

20 MS. TROY: Objection. Calls for a legal  
21 conclusion. She can answer if she understands.

22 MR. KATAEV: Please don't coach the  
23 witness with, If she understands. This is the  
24 second time you have done that.

25



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2 BY MR. KATAEV:

3 Q You can answer the question.

4 A Honestly, I'm not sure. I don't know if  
5 it was recorded, the customers that I knew that I  
6 didn't get paid on, I don't remember. This is going  
7 years back now.

8 Q I'm going to explain what backpay is in  
9 order to help you understand the question so you can  
10 answer it, okay?

11 A Uh-huh.

12 Q Backpay is an amount of money that you  
13 would be entitled to if you continued working at  
14 Hillside Auto and didn't have to leave. It is  
15 something that you get to claim, but it's subject to  
16 mitigation if your new job that you worked at right  
17 after you started paid less than what you received  
18 at Hillside.

19 With that basic explanation --

20 MS. TROY: The explanation is incorrect.

21 Q With that basic explanation and subject to  
22 any objection that she puts, are you claiming  
23 backpay in this case; yes or no?

24 MS. TROY: Objection. The instruction as  
25 to backpay is incorrect. She can answer based

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2 on your incorrect definition.

3 BY MR. KATAEV:

4 Q Subject to that objection, you can answer.

5 A Honestly, I'm not entirely sure because  
6 you did say if I was making less at my next job?

7 Q Correct.

8 A I don't understand.

9 Q After you left Hillside Auto Outlet, you  
10 went to work at NYC Motor Cars; yes or no?

11 A Yes.

12 Q The money that you made at NYC Motor Cars,  
13 at least for the first few months, was less than  
14 what you were making at Hillside Auto Outlet,  
15 correct?

16 A Yes.

17 Q Are you claiming the difference for  
18 backpay in this case?

19 A I'm not sure.

20 Q Is it true that you made less money at NYC  
21 Motor Cars initially than when you worked at  
22 Hillside Auto Outlet?

23 A The first couple of weeks, yes.

24 Q After the first couple of weeks you made  
25 more than you ever made at Hillside Auto Outlet,

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2 correct?

3 A Yes.

4 Q Did there come a time when you didn't make  
5 as much as you made at Hillside Auto Outlet after  
6 that?

7 A I mean, up until Covid.

8 Q When Covid hit, you weren't making  
9 anything for some time, right?

10 A Right.

11 Q That was because of Covid?

12 A Right.

13 Q After you went back in the workforce after  
14 Covid, did you ever make less money than you made at  
15 Hillside Auto Outlet again?

16 A No. Roughly the same or more.

17 Q Were there any benefits that you had at  
18 Hillside Auto Outlet that you didn't have at any of  
19 the subsequent dealerships you worked at?

20 A No.

21 Q Had everything worked out with Hillside  
22 Auto Outlet and you would have continued working  
23 there, how long did you assume you would stay at  
24 that job?

25 MS. TROY: Objection. Purely

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2 hypothetical.

3 Q You can answer.

4 A Realistically, prior to Isaac leaving, I  
5 was pretty happy so who knows. I probably would  
6 have been there until this day. I probably would  
7 have been a finance manager, who knows.

8 Q What was the longest time period you ever  
9 held any prior job?

10 MS. TROY: Do you have a timeframe,  
11 Counselor?

12 Q Ever in your whole life?

13 A I want to say two-and-a-half years.

14 Q That was with?

15 A NYC Motor Cars.

16 Q You're saying two-and-a-half years based  
17 on your experience initially at Motor Cars and when  
18 you returned?

19 A Yes.

20 Q You're combining those, right?

21 A Yes, right.

22 Q Sometime when you left your prior  
23 employment that we discussed earlier in your  
24 testimony, you would explain that you sort of saw  
25 the writing on the wall with respect to something

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2 and you would leave as a result of that, correct?

3 MS. TROY: Objection. Ambiguous. I have  
4 no idea what you're talking about.

5 MR. KATAEV: Just, Objection and  
6 ambiguous. The rest is superfluous.

7 BY MR. KATAEV:

8 Q You can answer the question.

9 A Can you repeat it?

10 Q You testified before about sometimes you  
11 would be leaving a job because you saw the writing  
12 on the wall with respect to something. For example,  
13 at Luxury Motor Cars, you saw there was really no  
14 business and you left; do you remember that  
15 testimony?

16 A Yes.

17 Q With respect to Hillside Auto Outlet in  
18 January of 2019, did you see any such circumstances?

19 MS. TROY: Objection to the term, Writing  
20 on the wall.

21 MR. KATAEV: That term is not in this  
22 question.

23 BY MR. KATAEV:

24 Q You can answer the question.

25 A Again. It's not -- the question is not

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2 clear. Can you rephrase it? I'm sorry.

3 Q I'll start with an example. In January of  
4 2019, prior to making your decision to quit, did you  
5 notice, for example, there was less business like  
6 you noticed at Luxury Motor Cars?

7 A No, because there wasn't less business.

8 Q Using that as an example, were there any  
9 other circumstances at that time that led to your  
10 decision to quit other than what we already  
11 discussed?

12 A No.

13 Q It's fair to say that all the jobs you had  
14 after you left Hillside Auto Outlet, at those jobs  
15 you obtained income, correct?

16 A Yes.

17 Q What other income from any other source  
18 did you obtain other than from those jobs that we  
19 discussed?

20 MS. TROY: Objection. Ambiguous.

21 Q You can answer.

22 A Besides that employment, working -- I did  
23 start doing -- being a broker but that was very  
24 short-lived.

25 Q Real estate broker?

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2 A No, automobile broker.

3 Q Did you earn any income as an automobile  
4 broker?

5 A Nothing but a couple of thousand.

6 Q Why was it short-lived?

7 A It was during Covid. It was trial and  
8 error, definitely error.

9 Q You decided to stop working in that area?

10 A Yes. It wasn't paying my bills.

11 Q Any other source of income?

12 MS. TROY: Can we have one second? I will  
13 bring her water.

14 MR. KATAEV: Yes, of course. Off the  
15 record.

16 (Whereupon, an off-the-record discussion was held.)

17 BY MR. KATAEV:

18 Q You testified that you're no longer  
19 employed as of right now, correct?

20 A Yes.

21 Q That's because of the birth of your second  
22 child, correct?

23 A More or less.

24 Q Have you made any effort since the birth  
25 of your second child to enter back into the

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2 workforce?

3 A I have.

4 Q What efforts did you make?

5 MS. TROY: Irrelevant. She can answer.

6 A That was one of the places that I had  
7 mentioned. I went to NYC Motor Cars -- I'm sorry,  
8 NY Luxury Motors. It didn't work out. They had no  
9 business at all, like not a single soul would walk  
10 in for weeks at a time.

11 Q Other than working there and giving that a  
12 go, did you work anywhere else?

13 A Another place I mentioned, Great Neck  
14 Motors Sports.

15 Q No other employers other than those two,  
16 right?

17 A No.

18 Q Those are places where you worked. What  
19 about places were you applied for a job?

20 A I mean, there is quite a few. Whether or  
21 not I would go on the interview is a different story  
22 after doing my research about the places. Really  
23 the only job offer that I turned down was Audi of  
24 Queens, Queens Auto Mall, and I was also offered a  
25 position at Baron Auto Emporium.



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2 Q With respect to each of these positions  
3 that you were offered, why is it that you were --  
4 withdrawn.

5 Why is it that you rejected the offer  
6 of employment? Let's start with Audi of Queens.

7 A It was going to be definitely a different  
8 change of environment. New car stores is a lot  
9 tougher. I sat there for a couple of hours and I  
10 didn't see anybody come in. Coming from places that  
11 have walk in traffic, that's alarming to me.

12 You spoke about those certifications.  
13 There was going to be a whole lot of certifications  
14 so I wouldn't have got to sell a car for a month or  
15 two months until I completed those certifications.  
16 In those luxury high-end stores, you have to  
17 complete everything before you grab your first  
18 customer. That's the reason I didn't take that job.

19 Queens Auto Mall didn't offer enough  
20 money. I went in there for a BDC manager position  
21 and the pay was super low, so I wasn't going to do  
22 that. Baron Auto Emporium, I was in fear that I was  
23 going to lose my job because it had the name Baron  
24 in it. I don't know who the owners are. I was  
25 offered the position multiple times and declined

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2 because I didn't want to get fired later on.

3 Q Who offered you the position at Baron?

4 A I want to say Freddie, the GM. David was  
5 the one who told me about Freddie, they were  
6 friends. Prior to him telling me about it, I had  
7 already went on the interview and he offered me the  
8 position two or three times. I just didn't want to  
9 deal with having to get fired for any reason because  
10 that did happen to David in the past.

11 Q Where did that happen to David?

12 A When he was working at North Shore Motors.  
13 They ending up firing him after finding out about  
14 this case.

15 Q How do you know that?

16 A That's what he told me.

17 Q Do you know how he knows that?

18 A Honestly, I didn't bother to ask.

19 Q When was the last time you spoke to David?

20 A Probably a couple of weeks ago.

21 Q What is the nature of your relationship  
22 with him?

23 A We are -- I wouldn't say we are close, but  
24 we are friends.

25 Q Other than Audi of Queens, Queens Auto

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2 Mall and Baron Auto Emporium did you submit your  
3 resume or job applications for any other positions  
4 elsewhere?

5 A Yes. A ton of places.

6 Q Is there a centralized location from which  
7 you did that on the internet or elsewhere?

8 A Indeed.

9 Q Is it only Indeed?

10 A For the most part. I might have submitted  
11 a resume or two off the Craigslist, but pretty much  
12 Indeed is the only place.

13 Q Whenever you submitted something on Indeed  
14 or Craigslist, you did that with the same email  
15 address, correct?

16 A More or less.

17 Q What is the email address that you used  
18 for Indeed?

19 A Lsticia3@Gmail.

20 Q That's the same email address you used for  
21 Craigslist?

22 A Yes. I would say so, yes.

23 Q You never looked into recruiters or  
24 anything like that, right?

25 A I don't think so, no.

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2 Q How much time have you spent on your job  
3 search each day since you were ready to return to  
4 work following the birth of your second child?

5 MS. TROY: Objection as to relevance. She  
6 can answer.

7 A When I get a few minutes, I will look and  
8 see if there is anything intriguing. I'm a numbers  
9 person. If it doesn't make sense, I would rather be  
10 home with my children. I can't put a timeframe on  
11 it.

12 Q How are you supporting yourself while  
13 you're unemployed?

14 A Right now, my mom is currently pretty much  
15 supporting me and my kids.

16 Q What does she do?

17 A My mom, she sells Auto Trader.

18 Q Was she involved in the automobile  
19 business before you got involved with Hillside Auto  
20 Outlet?

21 A No.

22 Q What did she do before Auto Trader?

23 A She worked for Spectrum Communications.  
24 She was a territory manager.

25 Q She no longer works there?

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2 A No.

3 Q You testified about taking some time off  
4 for a vacation in September of 2020. Do you recall  
5 that?

6 A Of 2020?

7 Q I believe so.

8 MS. TROY: Mischaracterizes witness  
9 testimony but she can answer.

10 A Are we talking when I said I went out of  
11 the country?

12 Q Yes.

13 A That was actually of 2022, not of 2020. I  
14 went out of the country. I went on a boat, on a  
15 cruise to Bermuda.

16 Q Since September of 2020 until now, have  
17 you taken any vacations?

18 A No.

19 Q Prior to September of 2022, when did you  
20 take your vacation prior to that time?

21 MS. TROY: Objection as to relevance. She  
22 can answer.

23 A I went to Florida in August.

24 Q How long?

25 A About two weeks.

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2 Q Prior to that?

3 A I think before that it would have been  
4 like 2021.

5 Q Do you remember what month?

6 A I went to Puerto Rico in May for Mother's  
7 Day.

8 Q Prior to that?

9 A Actually, in June of 2021 -- was it 2021?  
10 Yes, in June of 2021, I went to California and also  
11 in May of 2021, I went to Florida again.

12 Q In May and June of 2021, you visited  
13 Puerto Rico?

14 A Yes.

15 Q Florida and California, correct?

16 A Yes.

17 Q What part of California was it?

18 MS. TROY: Objection as to relevance.

19 Where are we going with this? She can answer.

20 BY MR. KATAEV:

21 Q Go on.

22 A We stayed in Los Angeles.

23 Q Prior to those vacations in May and June  
24 of 2021, when was your last vacation?

25 MS. TROY: Objection as to relevance. She

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2 can answer.

3 A Honestly, I don't remember. I know I went  
4 on another cruise but I don't remember the  
5 timeframe.

6 Q Did you travel during Covid between March  
7 and December of 2020?

8 A No.

9 Q There was one other cruise prior to that  
10 May or June of 2021 set of vacations. During any of  
11 those vacations, all of them, did you ever do job  
12 search activity while on vacations?

13 MS. TROY: Objection as to relevance.

14 Q You can answer.

15 A I don't remember honestly.

16 Q Were you unavailable to work since the  
17 termination of your employment, other than for the  
18 birth of your second child?

19 A One more time.

20 Q Were you unavailable to work since you  
21 left Hillside Auto Outlet, other than due to the  
22 birth of your second child?

23 A No.

24 Q And first child.

25 Are you currently attending any

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2 school or taking any classes?

3 A No.

4 Q Have you taken on any training courses or  
5 anything like that?

6 A No.

7 Q Have you ever been self-employed?

8 A Yes.

9 Q Can you explain?

10 A That's when I was doing the broker thing.

11 Q Have you ever received any long-term or  
12 short-term disability insurance benefits?

13 A No.

14 Q Did you apply after you gave birth for  
15 short-term disability?

16 A Is that the same thing as the paid family  
17 leave or is that different?

18 Q It's different, but tell me about that.

19 A I received a paid family leave after my  
20 first child was born.

21 Q Did you apply for that after your second  
22 child was born?

23 A I did not.

24 Q When you applied for it the first time,  
25 when your first child was born, did you have to



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2 provide information about your income?

3 A That was all done by the dealership, by  
4 Luxury Motor Cars. I'm not sure exactly. They  
5 filled out everything and sent it in.

6 Q Other than paid family leave, do you  
7 recall whether short-term disability benefits were  
8 applied for?

9 A I don't believe so.

10 Q You received paid family leave for  
11 approximately 12 weeks, right?

12 A I think so.

13 Q It was a percentage of your actual income  
14 at the dealership, correct?

15 A I believe it was capped at \$700.

16 Q You received the full cap, right?

17 A Yes.

18 Q Have you received any Social Security  
19 benefits including Social Security disability  
20 insurance benefits since your termination?

21 A No.

22 Q Have you received any workers' comp.  
23 benefits?

24 A No.

25 MS. TROY: Asked and answered.

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2 MR. KATAEV: No, I didn't ask her if she  
3 received benefits. I asked her if she applied  
4 for benefits, not if she received benefits.

5 BY MR. KATAEV:

6 Q You testified that you received  
7 unemployment insurance benefits, correct?

8 A Yes.

9 Q You only applied for unemployment  
10 insurance benefits once, correct?

11 MS. TROY: Timeframe?

12 Q In your whole life.

13 A No.

14 Q With respect to the testimony that you  
15 previously provided about applying for unemployment  
16 insurance benefits, what employer did you apply for  
17 that from after being let go?

18 A Luxury Motor Club was the first one.

19 Q Okay.

20 A Great Neck Motor Sports. I was there  
21 while I was pregnant.

22 Q Were those the only two?

23 A If I'm not mistaken, yes. Wait, actually,  
24 I believe NYC Motor Cars was in there too because  
25 that was during the period of Covid. I'm not

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2 100 percent sure but it might have been.

3 Q Understood. Had you received an offer of  
4 reinstatement from Hillside Auto Outlet, would you  
5 have returned?

6 A Possibly.

7 Q Why would you return?

8 MS. TROY: Timeframe, but she can answer  
9 the question.

10 A Read it back.

11 (Whereupon, the referred to question was read back  
12 by the reporter.)

13 A If would all depend on the circumstances,  
14 of course. If the offer was presented and it was a  
15 decent one, possibly.

16 Q You are aware that an offer of  
17 reinstatement was made, correct?

18 A When we were at the conference?

19 Q That's correct.

20 A Okay. I didn't completely understand the  
21 question. I thought you meant at the time being.  
22 At this point, yes, I would not accept it, but if it  
23 was at the time of everything going on, possibly,  
24 yes.

25 Q You rejected the offer of reinstatement at

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2 the conference, correct?

3 A Yes.

4 Q The conference that you attended with your  
5 counsel, is that the first time you entered a  
6 federal courtroom?

7 A Yes.

8 Q You testified previously that Ali, David  
9 and Brianna made statements to you concerning the  
10 alleged discrimination; do you recall that  
11 testimony?

12 A Yes.

13 Q Other than those three individuals, did  
14 you discuss the alleged discrimination with anyone  
15 else?

16 A Um, yes.

17 Q Who?

18 A Iris, which is Jay's sister. Are we  
19 talking about the dealership or in general?

20 Q In general anyone.

21 A Family.

22 Q Such as who?

23 A My mother, my grandmother, my children's  
24 father.

25 Q Anyone else?

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2 A Not that I can recall.

3 Q No one else at the dealership other than  
4 Iris and the three people we discussed, right?

5 A Yes, pretty much.

6 Q What did you discuss with Iris?

7 A I would kind of complain about what's  
8 going on.

9 Q Would it be fair to say you were venting  
10 to her?

11 A Yes.

12 MS. TROY: Objection to that  
13 characterization.

14 Q When did that discussion happen; month and  
15 year?

16 A I don't recall. It must have been around  
17 December of 2018.

18 Q Was that discussion held in person, by  
19 phone or otherwise?

20 A At the dealership.

21 Q At the dealership in person, correct?

22 A At the dealership in person.

23 Q What did she say after you complained to  
24 her about what happened?

25 A I don't recall. I wouldn't put any words

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2 in anyone's mouth and I don't remember.

3 Q That's fine. Do you have any notes or  
4 written records about any of the discussions that we  
5 just talked about or in general about the alleged  
6 discrimination?

7 A No.

8 Q Do you keep a journal or diary?

9 A No.

10 Q Did you write anything about the alleged  
11 discrimination at all?

12 A No.

13 Q Did you email or text anyone about the  
14 alleged discrimination?

15 A Not that I kept records of.

16 Q So you recall sending texts or emails but  
17 you didn't keep them?

18 A Right.

19 Q When did you dispose of the emails or the  
20 texts?

21 A It wasn't so much as disposing them. I do  
22 get new phones pretty often, I like to have the  
23 newest phone. It probably just got deleted from  
24 changing phones or whatever the case may be. I  
25 don't know.

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2 Q When was the last time you replaced your  
3 phone?

4 A Actually this past December. I got  
5 upgraded for Christmas.

6 Q Someone gave it to you as a gift or you  
7 bought it?

8 A My mother got it for me as a gift.

9 Q Who do you recall sending text messages or  
10 emails to about the alleged discrimination?

11 A Again, the same three people. Those were  
12 pretty much the only people that I spoke to about  
13 the situation in general.

14 Q Do you have any other notes or writings in  
15 any format documenting the alleged discrimination?

16 A No.

17 MR. KATAEV: This is a good time for us to  
18 stop and take lunch. We will come back at 1:30  
19 and we will start by doing exhibits, and I  
20 think -- I'm hoping we will be done by 3:00,  
21 but I can't promise. That's my guesstimate,  
22 okay. I have -- I will have the exhibits  
23 mostly up on the screen.

24 MS. TROY: Whatever that has multiple  
25 pages just send it to us, it may be easier so

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L. Stidhum

we don't have to waste time.

MR. KATAEV: I will try to work on that.

I will put them in the same Dropbox as the  
settlement production and can you work off that  
and I send you the link again.

MS. TROY: Fine.

MR. KATAEV: We are off the record.

(Luncheon recess: 12:58 p.m)

\*\*\*

(Afternoon session: 1:51 p.m.)

L E T I C I A F R A N C I N E S T I D H U M,  
resumed, having been previously duly sworn, was  
examined and testified further as follows:

EXAMINATION BY

MR. KATAEV: (Continued)

(Defendant's Exhibit C, Marked for Identification.)

Q Defendant's Exhibit C. This is  
Plaintiff's Initial Disclosures. I will represent  
to you, Ms. Stidhum, that these were sent to us on  
June 21st, 2022. Do you recognize this document?

A Yes.

Q To your knowledge, what is this document?



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2 A There is a couple. So honestly, when you  
3 scroll down a little bit, I will be able to...

4 Q I will represent to you in this document,  
5 among other things, you identify witnesses; do you  
6 see that?

7 A Yes.

8 Q You identify yourself, all employees,  
9 David Manrique and the four individual Defendants,  
10 right?

11 A Yes.

12 Q Why did you not list as witnesses the  
13 other three people we discussed; Brianna, Iris and  
14 Ali?

15 A Honestly, those were conversations that  
16 were brief and, you know, about the situation at the  
17 time so I didn't really think that it would be very  
18 useful just because there was no evidence behind it,  
19 I guess you can say.

20 MS. TROY: We will amend initial  
21 disclosures and send it to you.

22 MR. KATAEV: Okay.

23 BY MR. KATAEV:

24 Q In here, you identify no documents that  
25 are relevant to the case, correct?

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1 L. Stidhum

2 A Right, I didn't have anything.

3 Q In terms of producing documents, you  
4 reproduced the paystubs we produced to you and some  
5 information about your sonogram, correct?

6 A Right.

7 Q At the end of this, you state that a  
8 damage calculation will be provided, correct?

9 A I'm sorry.

10 Q At the end of this, you state a  
11 computation of the damages will be provided,  
12 correct?

13 A Right.

14 Q During the lunch break, without divulging  
15 the actual conversation you had, did you discuss  
16 your testimony with your attorney?

17 A No.

18 Q We were talking before about your  
19 cellphone and how you like to have the latest model  
20 and you most recently got one?

21 A Right.

22 MS. TROY: Um, objection.

23 Mischaracterizes witness testimony but fine.

24 BY MR. KATAEV:

25 Q Whenever you obtained a new phone, you use

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2 iCloud to restore the backup from your prior phone,  
3 right?

4 A Sometimes. Once you lose certain access  
5 or if you have a two-factor identification, you  
6 can't get into the same iCloud account so that's  
7 pretty much what happened to me. I actually just  
8 made a new one again.

9 Q You still have the old phone in your  
10 possession, correct?

11 A No, I do not.

12 Q What did you do with the old phone?

13 A Honestly, I can't tell you what I did with  
14 it. I don't know if that's the one I gave to my  
15 great-grandmother. I'm not sure.

16 Q We talked earlier about a Facebook post  
17 and I asked you questions about whether you posted  
18 anything about securing or obtaining millions of  
19 dollars in a lawsuit, correct?

20 A Right.

21 Q That post was not about your lawsuit  
22 against Hillside Auto Outlet, that post was about  
23 your mother's lawsuit, correct?

24 A No, my stepfather. If this -- I'm not  
25 sure. I don't know what post we are talking about

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2 specifically. Yes, my stepfather did obtain a  
3 couple of million dollars working for the Department  
4 of Sanitation.

5 Q Were the attorneys representing your  
6 father in that lawsuit the same attorneys  
7 representing you here?

8 A No.

9 Q Was your mother ever involved in any  
10 lawsuit?

11 A No.

12 Q Your mother didn't have any lawsuit  
13 against Spectrum or Charter?

14 A No.

15 MS. TROY: Objection as to relevance.

16 Q To your knowledge, did your mother ever  
17 make any claim without filing a lawsuit against  
18 Charter or Spectrum?

19 A I don't believe so.

20 Q Did the attorneys that -- did she hire  
21 attorneys to pursue that claim?

22 A She ended up not pursuing it.

23 Q Did the attorneys that she consult with  
24 include the current attorneys that you are utilizing  
25 for this lawsuit?

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2 MS. TROY: Objection as to relevance. You  
3 may answer.

4 A I believe she had a conference with them  
5 just to see if there was anything, but I'm not sure.

6 MS. TROY: Objection to the extent you're  
7 prying into attorney/client privilege.

8 Q Did you learn about this law firm through  
9 your mother?

10 A No.

11 Q How did you learn about Troy Law?

12 A Google.

13 Q What did you search for?

14 A I don't know.

15 MS. TROY: Objection to form as to  
16 relevance. She may answer.

17 A I don't remember honestly. Attorneys near  
18 me maybe. There were a mile and a half away.

19 Q You chose them because they were close by?

20 A They were the first people I spoke to and  
21 they made me feel comfortable.

22 Q I'm going to place up on the screen what  
23 has been marked as Defendant's Exhibit D.

24 (Defendant's Exhibit D, Marked for Identification.)  
25

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2 BY MR. KATAEV:

3 Q I will represent to you these are damage  
4 calculations that were produced on January 30, 2023.  
5 Do you recognize this document?

6 A Yes.

7 Q At the top left, your law firm's name and  
8 address is listed, correct?

9 A Yes.

10 Q It's titled, Damages Calculations,  
11 correct?

12 A Yes.

13 Q After that, there is a box where the case  
14 name, case number and the forum that it's in is  
15 listed, correct?

16 MS. TROY: Objection. The document speaks  
17 for itself. You don't need to waste time over  
18 this.

19 BY MR. KATAEV:

20 Q You can answer.

21 MS. TROY: She can answer the question.  
22 You're just wasting time. Go ahead, answer the  
23 question.

24 A What is the question? If I see it? Yes,  
25 I see it.

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1 L. Stidhum

2 Q It lists the case name and case number,  
3 correct?

4 A Yes.

5 Q After that, it shows the time period of  
6 December 1st of '18 through January 14th of '19,  
7 correct?

8 A Yes.

9 Q The calculated total number of weeks for  
10 that time period is listed as 6.43, right?

11 A Yes.

12 Q What you're saying is your total weekly  
13 pay prior to any discrimination averaged \$1,238.64,  
14 correct?

15 A Yes.

16 Q That's based the on actual paystubs which  
17 are listed below, which show all of your paystubs  
18 from May of '18 until January of '19, correct?

19 A Yes.

20 Q Right here is the calculation of that  
21 average and before you announced your pregnancy,  
22 correct?

23 A Yes.

24 Q After that is the calculation of your  
25 average after you announced your pregnancy, correct?

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1 L. Stidhum

2 A Yes.

3 Q So taking the difference between those two  
4 numbers, you came up --

5 MS. TROY: Emanuel, this is not an  
6 arithmetic test.

7 MR. KATAEV: Tiffany, stop interrupting.

8 MS. TROY: You're like, A minus B, is that  
9 equal to C?

10 MR. KATAEV: Stop interrupting my  
11 deposition. Stop. All you have to say is  
12 objection and grounds, that's it.

13 MS. TROY: Objection.

14 MR. KATAEV: Your objection is noted for  
15 the record. I'm going to proceed with my  
16 deposition.

17 BY MR. KATAEV:

18 Q The difference of \$428.64 is what you  
19 obtained when you subtract this \$1,238.64 number  
20 from the 810 number, correct?

21 MS. TROY: Objection. My client is not  
22 going to be subject to an arithmetic test. If  
23 she knows how to do it by her brain --

24 MR. KATAEV: I'm calling the court. I'm  
25 not dealing with this. We are going to put



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2 everything you said on the record and we are  
3 calling the court. You will not interrupt my  
4 deposition.

5 MS. TROY: You can tell the court that you  
6 asked her --

7 MR. KATAEV: You can tell the court  
8 whatever you want. This is ridiculous.

9 MS. TROY: I will make the objections that  
10 I need to make but I'm not going to interrupt  
11 your deposition. That's it.

12 MR. KATAEV: Good. Please don't do it  
13 again. Say, Objection, and the basis and move  
14 on unless you're instructing her not to answer.

15 BY MR. KATAEV:

16 Q Ms. Stidhum, the difference between  
17 \$1,238.64 and \$810 is calculated as \$428.64,  
18 correct?

19 A Yes.

20 Q What happened is you take the \$428.64, you  
21 multiple that by the 6.43 weeks and you get a  
22 shortfall of \$2,755.54, correct?

23 A Yes.

24 Q You went over this chart with your  
25 attorneys, correct?

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2 A Yes.

3 Q You listed this as your economic damages  
4 in this place, this place and this place, correct?

5 MS. TROY: Objection. She did not herself  
6 list it.

7 Q By and through you, correct?

8 A Yes.

9 Q Now you have here \$100,000 under the  
10 compensatory damages; do you see that?

11 A Yes.

12 Q Unlike the damages that we just went over,  
13 there is not calculation for the \$100,000, correct?

14 A Yes.

15 Q Where is the calculation for the \$100,000;  
16 where is that number coming from?

17 A Honestly, that's something that has to be  
18 discussed with my attorney.

19 Q The answer is you don't know?

20 A I don't.

21 Q Same question for the punitive damages,  
22 two million dollars in these three places; do you  
23 see that?

24 A Yes.

25 Q Where is that number coming from?

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2 A That's something to discuss with my  
3 attorney.

4 Q You don't know the answer, correct?

5 A No.

6 Q I'm placing up on the screen what will be  
7 marked as Defendant's Exhibit E. It's the Responses  
8 to Defendants' Interrogatories. Are you familiar  
9 with this document?

10 (Defendant's Exhibit E, Marked for Identification.)

11 MS. TROY: Scroll through the doc.

12 A Yes.

13 MS. TROY: Make it slightly bigger. We  
14 are having a hard time seeing it. Too big.

15 MR. KATAEV: I don't need commentary.

16 Thank you.

17 BY MR. KATAEV:

18 Q In the first interrogatory that was asked  
19 of you, we asked, Set forth with detail and with  
20 specific numerical calculation all categories of  
21 damages asserted by Plaintiff, correct?

22 A Yes.

23 Q In response, you directed us to the  
24 damages calculations that we just reviewed, correct?

25 A Right.

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2 Q But as we just went over, there are no  
3 calculations for the compensatory damages or the  
4 punitive damages, right?

5 A Right.

6 MS. TROY: Emanuel, that's factually  
7 incorrect.

8 MR. KATAEV: We can take it up after the  
9 deposition. Please don't interrupt unless you  
10 have an objection. Thank you.

11 BY MR. KATAEV:

12 Q You identify over here, Ali in response to  
13 Interrogatory Number 2 which requests the identity  
14 of witnesses Ali Raskesnia. R-a-s-k-e-s-n-i-a.

15 Do you see that?

16 A Yes.

17 Q This is the Ali with whom you went to NYC  
18 Motor Cars, correct?

19 A Correct.

20 Q Iris Serrano is the Iris we discussed  
21 earlier today, correct?

22 A Yes.

23 Q You say here that her address and phone  
24 number are unknown. Do you not maintain telephone  
25 contact with this individual?

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2 A No.

3 Q The last time you spoke to Iris was at the  
4 dealership, correct?

5 A Not at the dealership. I do have her on  
6 Snapchat so we spoke here and there but not much.

7 Q On Snapchat you discussed this case?

8 A No. The only thing I did ask regarding  
9 this case was if she knew the last name of Lily.

10 Q Understood. Did she give you the answer?

11 A No, she wasn't sure what her last name  
12 was.

13 Q In response to Interrogatory Number 7,  
14 which asks whether you ever complained to Hillside  
15 Auto Outlet about discriminatory conduct and to  
16 provide information about each such complaint. Your  
17 answer only provides information about your  
18 conversation with Isaac and Jory, correct?

19 A I'm sorry, one more time.  
20 (Whereupon, the referred to question was read back  
21 by the reporter.)

22 A Right.

23 Q You did not provide any information about  
24 your alleged discussion with Ronald, correct?

25 A Well, that wasn't a discussion about the

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2 discrimination -- the pregnancy discrimination.

3 That was more about me telling him about the bonus.

4 Q Is it fair to say that the bonus has  
5 nothing to do with your pregnancy?

6 A No, because the bonus kind of played a  
7 part in it. My pregnancy was the reason for me kind  
8 of pushing to get this bonus to begin with.

9 Q Why did you not list your conversation  
10 with Ronald in this response?

11 A Honestly, it must have slipped my mind.  
12 Like I said, it was more of a conversation about the  
13 bonus and receiving that money for doing x amount of  
14 cars rather than the initial complaint of what was  
15 going on about the pregnancy discrimination.

16 MR. KATAEV: I'm going to call for the  
17 Plaintiff to supplement her response to  
18 Interrogatory Number 7, and we will follow up  
19 in writing.

20 (Counsel Request.)

21 BY MR. KATAEV:

22 Q For clarification, some of the dealerships  
23 that you worked at after Hillside Auto both had the  
24 name Luxury in them but they were two separate  
25 dealerships, correct?

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2 A Correct.

3 Q They are two different locations?

4 A Yes. Two different locations, different  
5 owners.

6 Q In response to Interrogatory 19, you only  
7 identify Queens Auto Mall incorrectly typed here as  
8 hall. You failed to include the other two that you  
9 denied positions for, correct?

10 A Right, because honestly, it wasn't fresh  
11 in my mind.

12 MR. KATAEV: We are going to call for  
13 Plaintiff to supplement her response to this  
14 interrogatory and we will follow up in writing.

15 (Counsel Request.)

16 BY MR. KATAEV:

17 Q With respect to every position identified  
18 in response to Interrogatory Number 14, is it  
19 accurate to state that the pay you received at each  
20 of these dealerships was better than what you  
21 received at Hillside Auto Outlet?

22 A Yes.

23 Q If you have to give your best estimate as  
24 to the annual amount of money you would earn at  
25 Hillside Auto Outlet, how much would you say that

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2 was?

3 A Maybe like 60 or 70,000. I'm not sure. I  
4 didn't work there a full year.

5 Q When you applied for unemployment both  
6 times, did you receive the unemployment for the full  
7 six-month period both times?

8 A I believe so.

9 Q Do you recall whether it was the capped  
10 amount?

11 A I'm sorry.

12 Q Do you recall whether it was the capped  
13 amount?

14 A The first time I received it, yes. The  
15 other two times, it was not.

16 Q Has any injury or disability prevented you  
17 from working during any period of time?

18 A No.

19 Q Have you ever filed for bankruptcy?

20 A No.

21 Q As far as you know, you were never  
22 terminated from any job?

23 A Correct.

24 Q During the time that you worked at  
25 Hillside Auto Outlet, there came a point in time



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2 when you purchased a vehicle from the dealership,  
3 correct?

4 A One more time.

5 Q When you worked at Hillside Auto Outlet,  
6 you purchased a vehicle from the dealership,  
7 correct?

8 A Correct.

9 Q What car did you purchase?

10 A Infiniti Q50.

11 Q Do you still have that car?

12 A No, I do not.

13 Q What did you do with the car?

14 MS. TROY: Objection as to relevance. She  
15 can answer.

16 A It got totaled. I was rear-ended.

17 Q I'm sorry.

18 Did you obtain the vehicle from  
19 Hillside Auto Outlet on favorable terms?

20 A On favorable terms, as in -- what do you  
21 mean by that?

22 MS. TROY: Objection to form.

23 Q By whatever favorable terms means to you?

24 A No. After receiving the discovery, I was  
25 charged like every other customer. They made a

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2 couple of grand off of me.

3 Q How much did you purchase the vehicle for?

4 A I don't remember.

5 Q Did you do financing?

6 A Yes, I did.

7 Q It was a used vehicle, correct?

8 A Yes.

9 MS. TROY: Objection as to relevance.

10 Q Isn't it true that you complained to Isaac  
11 that the reason why Andris took so long to process  
12 employment applications -- I'm sorry, financing  
13 applications for customers is because he sucks?

14 A I don't remember. This is --

15 MS. TROY: Objection. Argumentative. She  
16 can answer.

17 MR. KATAEV: Please don't interrupt her  
18 while she's answering.

19 BY MR. KATAEV:

20 Q Repeat your answer.

21 A I don't remember.

22 MR. KATAEV: Let the record reflect that  
23 the witness laughed at the question.

24 I have placed up on the screen what will  
25 be marked as Defendants' Exhibit F.

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(Defendant's Exhibit F, Marked for Identification.)

BY MR. KATAEV:

Q For the record, these are monthly sheets as to cars sold at the dealership using the CRM system. It's Bates-stamped D2 through D9. This particular set is for May of 2018.

Ms. Stidhum, do you recognize this document?

MS. TROY: Scroll through whatever pages you're talking about.

MR. KATAEV: Sure. Let the record reflect that these activities are designed to waste time, to run the clock, as the Plaintiff has repeatedly make reference to the time of the deposition.

MS. TROY: If you want to play it that way, let the record reflect you said you wanted to start at 9:00, you started at 9:30. You said you wanted a 30-minute lunch break, you took a 45-minute lunch break. You're asking questions that are irrelevant to this case.

MR. KATAEV: Anything else?

MS. TROY: That's it for now.

MR. KATAEV: Let the record reflect that,

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2 at Plaintiff's request and insistence, we  
3 scrolled through D2 through D9.

4 BY MR. KATAEV:

5 Q Are you ready to answer some questions  
6 about this exhibit?

7 MS. TROY: Go back to the second page.

8 Okay.

9 BY MR. KATAEV:

10 Q Ms. Stidhum, other than due to this  
11 lawsuit and in the course of discovery, have you  
12 ever seen this document while working at the  
13 dealership?

14 A No.

15 Q Did you have access to the sold log  
16 through the CRM system while you worked at the  
17 dealership?

18 A I'm not sure. I didn't really use the  
19 CRM.

20 Q In this sheet, it says that you sold a car  
21 to an individual named Robert Gantt on May 27, 2018;  
22 do you see that?

23 A Yes.

24 Q It says it was sold for \$12,600 and at the  
25 front, it says negative 586 and at the back is 2011;

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2 do you see that?

3 A Yes.

4 Q By the front, that refers to the gross  
5 commissionable profit on the front end of the sale  
6 for the actual vehicle, correct?

7 A Yes.

8 Q On the back, that refers to any  
9 aftermarket items sold, whether it's something for  
10 the car or something like insurance or protection or  
11 warranty and stuff like that, correct?

12 A Yes.

13 Q On this particular deal, it was sold at a  
14 loss, correct?

15 A Yes.

16 Q You received \$150 for selling this car,  
17 correct?

18 A Yes.

19 Q But you didn't receive any bonus for this  
20 particular car, correct?

21 A When you say bonus, I'm not sure what you  
22 mean by bonus.

23 Q If I understand correctly for you to  
24 receive that 5 percent bonus, this number on the  
25 front end has to be \$3,000 or \$3,500 or more,

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2 correct?

3 MS. TROY: Objection. Mischaracterizes  
4 witness testimony.

5 A The total between the front and back would  
6 have to equal that, yes.

7 Q You have to add the two, correct?

8 A Yes.

9 Q The next car that's listed as sold by you  
10 in May of 2018 is a vehicle sold to one Darell  
11 Thomas on May 25th of 2018; do you see that?

12 A Yes.

13 Q But there is no information here about the  
14 front or back or the sold amount, correct?

15 A Right.

16 Q The third vehicle listed that's sold by  
17 you is to one John Collado, correct?

18 A Yes.

19 Q There was May 24th of 2018, correct?

20 A Yes.

21 Q On this particular sale the front and the  
22 back had a profit of \$1,628 and \$1,857 respectively,  
23 correct?

24 A Yes.

25 Q With the calculator I have on the screen

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2 calculating the total between the two, that comes  
3 out to \$3,485, correct?

4 A Right.

5 Q What you're saying is your bonus would be  
6 5 percent of that amount for a total of \$174.25; is  
7 that right?

8 A Right. It wouldn't be a bonus to the  
9 \$150. It was just that \$174.25 total.

10 Q It would be \$150 for making the sale plus  
11 \$174.25?

12 A No. That's what I'm trying to clarify.  
13 It would be the \$174.25.

14 Q Whenever you made more, you get 5 percent  
15 in lieu of the actual \$150 commission?

16 A Right. If you do \$3,000, that's  
17 5 percent, it would be \$150.

18 Q For this particular deal, you do receive  
19 \$174.25 instead of \$150, correct?

20 A Yes.

21 Q You know that because you referred to a  
22 sheet that was given to you in triplicate and you  
23 threw that sheet out after you confirmed that you  
24 were paid the right amount, correct?

25 A That's false actually. I wouldn't receive

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2 anything that showed the actual pay for the  
3 5 percent. It was just -- it would reflect on my  
4 paystub.

5 Q I see. On that sheet, would it list the  
6 front and back end gross commissionable profit?

7 A No. It would reflect on my paystub.

8 Q How would you know whether you would be  
9 entitled to a 5 percent bonus on top of -- in lieu  
10 of \$150 -- higher than \$150?

11 A I just started in the business so I kind  
12 of took their word for it. Jay was very honest with  
13 us. She would make sure that we were paid correctly  
14 all the time. After that, it's obvious -- you can  
15 tell the difference between being paid \$174.25 and  
16 the flat \$150.

17 Q I see. Could it be possible you didn't  
18 sell any vehicles at a profit?

19 A No, that's impossible because I remember  
20 on multiple occasions where Serge would be excited  
21 that I did a ten-pounder, which is a \$10,000 deal  
22 and I would still receive \$150 flat. That's  
23 impossible.

24 Q We just scrolled through all of the May of  
25 2018 and they were only three or four cars sold. Is



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2 it accurate that you only sold four cars in May of  
3 '18?

4 A I don't believe that's accurate, but then  
5 again, I did just start that month so it's a  
6 possibility. I know that this document I've looked  
7 over it, I went and checked how many cars it showed  
8 that I sold and it's not accurate at all.

9 Q What makes you say it's not accurate?

10 A Because even the amounts of cars sold is  
11 not the right number. None of it is the right  
12 numbers. If you look back at when I first received  
13 the 1,000 pages, I went -- I calculated based on my  
14 paystubs without the 5 percent how many cars did I  
15 sell for each month and how many cars it shows on  
16 that document you just showed me, which is only  
17 input by BDC and it definitely is not accurate.

18 Q At the top of page D2 next to the word,  
19 Sold log, it has in parenthesis the number 46; do  
20 you see that?

21 A Yes.

22 Q My understanding is this is listing the  
23 total amount of cars sold in May of 2018, correct?

24 A Correct.

25 Q You're saying that this number is not

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2 accurate?

3 A I can't say for May of 2018 because I just  
4 started that month and it was towards the middle of  
5 the month and I was not there for the full month,  
6 but I can confirm that months moving on, those  
7 numbers do not add up to the numbers I have based on  
8 my paystubs. Even in the mediation that we had, you  
9 said that this might not be everything, so I know  
10 for sure it is not.

11 Q To your knowledge, how did the dealership  
12 keep track of the total vehicles sold every month?

13 A Like I stated before, we had a board in  
14 the finance room where we would have the list of all  
15 the salespeople and they would tally every time they  
16 sold a car, and that's how we kept track of how many  
17 cars we had for the month. There was never a set  
18 log that was written down by anyone or nothing like  
19 that.

20 Q At the end of the month before starting a  
21 new month chart before erasing all the data for the  
22 month, did anyone ever take a picture of the board?

23 A Not to my knowledge.

24 Q I'm going to mark what will be Defendant's  
25 Exhibit G.

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2 (Defendant's Exhibit G, Marked for Identification.)

3 BY MR. KATAEV:

4 Q It is the same type of report for December  
5 of 2018 from D62 through D67. On this first page it  
6 says the total sold in December '18 is 36 cars,  
7 correct?

8 A Yes.

9 Q Is that accurate, to your knowledge?

10 A Honestly, I'm not sure because, again,  
11 like I said, I compared the documents and it doesn't  
12 look like these -- this log shows everything whether  
13 it was a walk-in customer or a appointment. It  
14 doesn't look like it shows everything.

15 Q Looking at page D65. There are two cars  
16 that you sold to two different people on the same  
17 day, December 10th of 2018, correct?

18 A Yes.

19 Q How was it that you were able to sell two  
20 cars in a single day?

21 A I don't understand the question. I have  
22 sold six cars in a day.

23 Q In this particular instance with respect  
24 to Monica Hampton, for example, was Andris Guzman  
25 the individual who helped you with the financing?

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2 A I don't recall. It does say, Pending  
3 delivery. This doesn't mean that I sold them both  
4 on the say same.

5 Q What about Prince Henston, do you recall  
6 whether Andris Guzman was the individual that helped  
7 you with the financing aspect?

8 A This is four years ago. I don't know who  
9 did what.

10 Q The following page, D66, there are two  
11 additional cars that were sold on or about  
12 December 6 and 8, correct?

13 A Right.

14 Q Finally on the last page, D67, there is a  
15 fifth car that was sold on December 1st of 2018,  
16 correct?

17 A Correct.

18 Q It's fair to say you sold at least five  
19 cars in December of 2018?

20 A I guess so, based on this.

21 Q Do you recall whether you sold more than  
22 five cars in December of '18?

23 A Again, I'm not sure because it was such a  
24 long time ago. I don't want to sit here and lie,  
25 but I don't remember selling -- I remember that I

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2 was very upset because I was probably selling one or  
3 two cars a week so this may be accurate.

4 Q Didn't you testify previously that you  
5 typically sold seven cars a month?

6 A No. Seven cars a week.

7 Q What was the least amount of cars you sold  
8 prior to December of '18 prior to your recollection?

9 A Again, it's a long time ago. I'm not  
10 going to give you fake numbers. I know for sure it  
11 was seven cars a week because if we do seven times  
12 \$150 plus that \$300, I would receive a check for  
13 \$1,050 and that was usually my goal for the week so  
14 that way I can bring home at least \$800 to \$900  
15 bucks.

16 Q I have placed up on the screen what will  
17 be marked as Defendant's Exhibit H.

18 (Defendant's Exhibit H, Marked for Identification.)

19 BY MR. KATAEV:

20 Q My question to you is: Have you ever  
21 seen --

22 MS. TROY: Did you skip some numbers from  
23 the exhibit?

24 MR. KATAEV: No.

25 MS. TROY: Okay, this is Exhibit H.

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2 MR. KATAEV: Yes.

3 BY MR. KATAEV:

4 Q Have you ever seen a document like this  
5 before? It's called cap sheet?

6 A No.

7 MR. KATAEV: Let's mark this as

8 Defendant's Exhibit I, I believe.

9 (Defendant's Exhibit I, Marked for Identification.)

10 BY MR. KATAEV:

11 Q I will represent to you that this is a  
12 declaration prepared by Serge and signed by him.  
13 Have you ever seen this document before?

14 A Yes, I did.

15 Q Serge says here in Paragraph one that he  
16 has served as an F&I representative since November  
17 of 2018; do you see that?

18 A Yes.

19 Q Does that comport with your recollection  
20 as to when he started working there?

21 A I thought it was a little sooner after Jay  
22 left.

23 Q He says here in Paragraph six that  
24 whenever the Plaintiff or any other salesperson  
25 makes a sale, the customer's information is provided

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2 to the sales manager or him, whoever is available  
3 and has authorization to pull the prospective  
4 customer's credit profile; do you see that?

5 A Yes.

6 Q That comports with your earlier testimony  
7 that typically Andris would handle it but sometimes  
8 he would, right?

9 A Right.

10 Q Paragraph seven says that once the credit  
11 profile is pulled, the customer's application to  
12 purchase a vehicle is submitted to chosen lenders;  
13 do you see that?

14 A Yes.

15 Q Do you know what is meant by, Chosen  
16 lenders?

17 A Yes. Qualifying, they have to qualify the  
18 customer based on their credit history.

19 Q There are different banks that accept  
20 different types of customers with different types of  
21 credit histories, correct?

22 A Correct.

23 MS. TROY: Can you speak slower?

24 MR. KATAEV: Sure.

25 MS. TROY: I'm having difficulty

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2 following.

3 BY MR. KATAEV:

4 Q In Paragraph eight, Serge declares that  
5 the timeframe to receive any word back from a chosen  
6 lender, which is also based on a customer's credit  
7 worthiness, ranges from ten minutes to one hour; do  
8 you see that?

9 A Yes, I do.

10 Q You have no reason to dispute that,  
11 correct?

12 A I mean --

13 MS. TROY: Objection. Argumentative. She  
14 can answer.

15 A I mean, honestly, most approvals are  
16 almost instant. I can't agree as long as one hour.

17 Q Has it ever been one hour since submitting  
18 something to a chosen lender?

19 A Honestly from my experiences, an hour, no.

20 Q Your experience is limited to the time  
21 when you had access to Dealertrack, correct?

22 A Yes.

23 Q You had access to Dealertrack since what  
24 month in 2018?

25 A I want to say towards the end -- after Jay



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2 left but I don't know how soon after.

3 Q That was somewhere in July or August of  
4 '18, correct?

5 A Yes.

6 Q That was taken away from you in December  
7 of '18, correct?

8 A Yes.

9 Q That's approximately two months, right?

10 MS. TROY: Objection. You need to do your  
11 math properly.

12 A It's four or five months.

13 Q How many submissions did you make to  
14 lenders in the four or five months that you had  
15 Dealertrack access?

16 A I didn't make submissions to lenders. I  
17 would run the credit and qualify them myself and  
18 prefill the application, so that way when it got to  
19 finance, whether it was Isaac or Serge, all they had  
20 to do was read over it, make sure I didn't make a  
21 mistake, check out their credit, submit the deal.  
22 Everything would be done.

23 Q When you submit the deal, that's when you  
24 have to wait for the lender to get back, right?

25 A Like I said, approvals are almost instant.

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2 Everything is done electronically.

3 Q You're saying that every time you submit a  
4 deal, a bank gets back instantly every single time?

5 MS. TROY: Objection. Mischaracterizes  
6 witness testimony. She can answer.

7 A Again, I didn't submit it to the lender.  
8 I only ran the credit, prefilled the application,  
9 would give the folder to the finance. Most of the  
10 time, I would stand right over him and wait and see  
11 who is going to pick it up, yes. The approvals were  
12 almost instant.

13 Q Since you didn't submit it, you had no  
14 independent knowledge as to how long it took,  
15 correct?

16 A That's incorrect. I had access to  
17 Dealertrack so I was able to see when the deal got  
18 approved or did not get approved.

19 Q Is there any data as far as you know  
20 that's kept in Dealertrack as to how long each deal  
21 takes from submission to response?

22 A No.

23 Q Paragraph nine, Serge declares that this  
24 timeframe of submission is completely outside the  
25 control of himself or any sales manager who pulls a

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2 credit profile and is further dependent on the  
3 amount of verification requested by each chosen  
4 lender, which is also completely outside the control  
5 of himself or any sales manager; do you see that?

6 A Yes.

7 Q Do you agree that it's outside the control  
8 of the sales manager, you know, the contents of this  
9 paragraph?

10 A Partially, because my argument was not  
11 whether or not the lender is taking x amount of  
12 time. It was about my customer's credit being ran  
13 and qualifying the customers within a certain amount  
14 of time so that's not properly worded.

15 Q What you're saying is what took longer is  
16 the part before this part?

17 A Right.

18 Q Okay. In order to complete the part  
19 before this part, you have to obtain information  
20 from the customer, correct?

21 A Right.

22 Q Sometimes the customer does not have all  
23 of the information, correct?

24 A Right.

25 MS. TROY: Objection. Asked and answered.

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2 Q It says in Paragraphs 12 through 14 the  
3 following, During the time Plaintiff worked here, I  
4 worked closely with her as well as all the other  
5 salespersons. Everybody liked each other and  
6 treated each other well. There was no animosity  
7 amongst the salespeople, myself or nor sales  
8 managers; is that true?

9 A Right up until the announcement of my  
10 pregnancy, of course.

11 Q Of course. What about the fact that you  
12 and Andris Guzman had two prior incidents where you  
13 got into an argument before you announced your  
14 pregnancy?

15 A Again, we still we kept it very  
16 professional. It's not somewhere where you're going  
17 to be bickering back and forth in front of potential  
18 customers.

19 Q Number 19 says, if a customer was forced  
20 to wait, the only reason for that would be based on  
21 circumstances outside of the dealership's control  
22 such as the failure of the customer to provide  
23 necessary information to the lender or because the  
24 lender requested additional documentation or simply  
25 because the dealership had to wait for the lender's

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2 response.

3 Do you have any reason to dispute  
4 that statement?

5 A No.

6 Q Finally at the end it says, In the course  
7 of the last four years working at the dealership,  
8 customers have waited to obtain information  
9 concerning approvals from 20 minutes until three  
10 hours on average.

11 Do you have any reason to dispute  
12 that statement?

13 A I have never seen it go as long as three  
14 hours, but...

15 Q What is the longest you have seen a  
16 customer wait to get a deal done?

17 A Probably, like -- I'm talking about wait  
18 times between him actually doing anything with my  
19 customer. That's what I'm talking about. I'm not  
20 talking about in general the total amount of buying  
21 a car. It's two different things we are talking  
22 about here. He's speaking about overall car  
23 purchase.

24 Q That's a fair distinction, but does the  
25 customer know?

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2 MS. TROY: Objection. Argumentative.

3 A I'm sorry.

4 Q Does the customer know?

5 A Does the customer know what?

6 Q That there is a distinction between  
7 waiting for their credit to be pulled versus  
8 submitting it to the bank?

9 A Absolutely. When your credit is pulled  
10 and you're qualified for a customer, you're told to  
11 start working on insurance, which can take up to --  
12 anywhere from ten minutes to an hour. Yes, the  
13 customer would know because immediately they are  
14 like, are we approved, are we wasting our time.  
15 Once I get the folder, I expect to respond to my  
16 customers and say, we are going to get this done,  
17 let's work on insurance.

18 Q In general, the whole car-buying process  
19 sometimes takes hours, right?

20 A It can.

21 MS. TROY: Objection. Argumentative. I'm  
22 going to direct my client to please wait if I  
23 have an objection or not because she's  
24 immediately answering your question.

25

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2 BY MR. KATAEV:

3 Q You can answer now.

4 A It can take up to -- it can take longer,  
5 but for the most part, we work relatively quick. So  
6 I'm speaking based on my experience, we would move  
7 pretty quickly because we were a store that would  
8 get a lot of walk-in traffic. I would want to grab  
9 two or three customers at a time.

10 Q What is the fastest that you ever  
11 processed the deal for a transaction?

12 MS. TROY: Objection. Specify timeframe.

13 Q Whenever you worked at Hillside Auto  
14 Outlet.

15 A I mean, getting them in and out the door,  
16 probably within an hour or less. I have had  
17 instances where I have gotten people out and in  
18 their car, registered and everything, in less than  
19 an hour.

20 Q How often does that happen?

21 A I work relatively quick. I would want to  
22 say maybe 40 to 50 percent. It's very rare I have  
23 customers waiting for hours.

24 Q Very impressive. I don't think that's the  
25 world's perception of how long it takes a car deal

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2 to go through, but very impressive.

3 MS. TROY: No need to do your commentary.

4 Ask your question.

5 MR. KATAEV: Do you have an objection,

6 Counselor?

7 MS. TROY: You were not asking a question.

8 You're making a commentary and talking to my

9 client.

10 MR. KATAEV: Do you have an objection?

11 MS. TROY: Again, you can tell the judge.

12 You're talking directly to my client and not

13 asking a question.

14 MR. KATAEV: I'm making sanctions against

15 you for interrupting my deposition.

16 MS. TROY: For telling you not to speak

17 directly to my client?

18 MR. KATAEV: Anything other than object

19 and state the grounds. Please stop

20 interrupting my deposition.

21 MS. TROY: I'm objecting. It's not a

22 question. You're talking to my client.

23 MR. KATAEV: Say, Objection, you're

24 talking to my client and shut up.

25 MS. TROY: Let the record reflect you told



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2 me to shut up.

3 MR. KATAEV: You are interrupting my  
4 deposition and I want you to stop. I'm tired  
5 of this problem with you. Please conduct  
6 yourself the way you're supposed to conduct  
7 yourself at a deposition.

8 MS. TROY: Telling another counselor to  
9 shut up is not professional.

10 MR. KATAEV: Okay.

11 BY MR. KATAEV:

12 Q I'm placing up on the screen what has been  
13 marked as Defendants's J. I will represent to you  
14 that this a document bearing Bates-stamp numbers  
15 D151 through D157.

16 (Defendant's Exhibit J, Marked for Identification.)

17 BY MR. KATAEV:

18 Q It concerns the lead for an individual  
19 named Charles Clark. Do you recognize that  
20 individual?

21 A No.

22 Q On D151 it says here, Working with  
23 Leticia; do you see that?

24 A Yes.

25 Q In status, there is multiple statuses

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2 listed but two of them are lost, correct?

3 A Right.

4 Q What does that mean to you that the status  
5 of a lead is lost?

6 A That they either didn't want to come in or  
7 they purchased it elsewhere. The lead was lost.

8 Q Typically in this program, there is a log  
9 of everything that happened with this lead, correct?

10 A I guess, yes.

11 Q Let's look at the log. Starting from the  
12 bottom of page D157, there is a inbound phonecall by  
13 Aditia on March 17, 2021, correct?

14 A Okay.

15 Q You see that?

16 A Yes.

17 MS. TROY: Objection as to timeframe.  
18 Objection to relevance.

19 Q We will skip this one.

20 MR. KATAEV: Let the record reflect that  
21 for this particular lead, it's a customer that  
22 returned after December 2018. A lead was lost.  
23 The information from December 2018 is not  
24 listed.

25

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2 BY MR. KATAEV:

3 Q The next exhibit is Defendant's Exhibit J,  
4 I believe and it's Bates-stamped D201 through D206.  
5 For this particular lead, on D201, the manager is  
6 listed as Andris Guzman, correct?

7 A Yes.

8 Q Going all the way to the bottom on  
9 January 11th of 2019, Tiffany listed that this  
10 customer is interested and will be here tomorrow any  
11 time from 10:00 to 2:00?

12 MS. TROY: Objection. The document speaks  
13 for itself.

14 A Yes.

15 Q On January 12th of 2019, there is a  
16 listing that says the showroom visit started on  
17 January 12th at 10:45 a.m. lasting six hours; do you  
18 see that?

19 A Yes.

20 MS. TROY: Objection. Document speaks for  
21 itself.

22 Q Is that common that a showroom visit can  
23 last up to six hours without a sale being made?

24 A BDC is in the back so they do not see what  
25 is going on in the front so they have to come out,

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2 grab the book where customers were logged and then  
3 they can log them.

4 So realistically was that customer  
5 there for six hours, absolutely not. She ended up  
6 logging it in after she saw what happened after she  
7 was able to communicate with whatever salesperson  
8 was working with them so that way she can log them  
9 in. That is not realistic.

10 Q Do you have any recollection as to why  
11 this particular lead was lost?

12 A No, I do not.

13 Q Let's go to Defendant's Exhibit K. This  
14 is Bates-stamped D249 and it ends with D254.  
15 (Defendant's Exhibit K, Marked for Identification.)  
16 BY MR. KATAEV:

17 Q At the top of this on January 1, 2019, it  
18 says that the customer is here now with Leticia,  
19 correct?

20 A Yes.

21 Q Then it says the showroom visit started on  
22 January 1st of '19 at 4:15 p.m. and lasted for  
23 22 hours.

24 A That goes to show it depends on when the  
25 BDC rep decides to come and check on their customer

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2 and log it in.

3 Q It says here at 5:15, an hour after the  
4 showroom visit started that, Going out under dad  
5 Antonio Yanes; do you see that?

6 A Okay.

7 Q What does that mean to you?

8 A He needed a cosigner and he did it under  
9 his father.

10 Q The customer left, as far as you could  
11 tell from reading this document, without buying the  
12 vehicle, correct?

13 A It's hard to say because if it went out  
14 under Antonio, there would be a new lead set up  
15 under Antonio.

16 Q Over here on January 8 of '19, it says  
17 that you made an outbound phonecall to him, correct?

18 A Yes.

19 Q How is that tracked? How did they know  
20 you made an outbound phonecall?

21 A I have no idea. You can log a call and  
22 then put what representative or who made that  
23 contact so I don't remember this.

24 Q It says here on January 26th that this  
25 lead was lost, correct?

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2 A Yes.

3 Q There were emails sent just to try to  
4 bring the customer back in and none of that worked,  
5 correct?

6 MS. TROY: Objection. Goes beyond what  
7 the witness would know. She can answer.

8 A Then again, there is a note there that  
9 said that it went out under the dad. If it says it  
10 went out under the dad, that means the car was  
11 delivered under the father's name.

12 Q Are you saying that they marked the lead  
13 as lost and that's incorrect?

14 A Possibly, because it says it went out  
15 under the dad. If we are going to write that it  
16 went out under the dad, that means he did not  
17 qualify so his father purchased the vehicle for him.

18 Q It's possible that he did, correct?

19 A I'm sorry.

20 Q It's possible that he did, correct?

21 A I mean, it wouldn't be there in a note if  
22 it wasn't true.

23 Q Let's look at Defendant's Exhibit L. This  
24 is Bates-stamped D288 through D293.

25 (Defendant's Exhibit L, Marked for Identification.)

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2 BY MR. KATAEV:

3 Q Starting from the bottom, there is a note  
4 here that on December 10th of '18, an appointment  
5 was set for December 10, right?

6 A Yes.

7 Q There is another text message here from  
8 one of the BDC people to come with proof of address  
9 and two recent paystubs if available, right?

10 A Yes.

11 MS. TROY: Objection. Document speaks for  
12 itself.

13 Q On the same day later that day, it says  
14 the customer was here with you, correct?

15 A Yes.

16 Q The next item in the log is outbound  
17 phonecalls by you and two days later another by the  
18 BDC rep, right?

19 A Right.

20 Q As far as you can tell from this document  
21 so far, this customer did not purchase any vehicle,  
22 correct?

23 A Right.

24 Q On December 15th based on a phonecall by  
25 the BDC rep, the customer said he needed money down

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2 and wouldn't be ready until February, correct?

3 A Yes.

4 Q At least this customer didn't leave  
5 because of your waiting to check creditworthiness,  
6 correct?

7 A From what we can tell at least.

8 Q The reason he knows he needs money down is  
9 because his credit was checked, correct?

10 A Yes.

11 Q This happened on December of 2018,  
12 correct?

13 A As it states.

14 Q Was this a one-off to all the situations  
15 that you experienced?

16 MS. TROY: Objection. Argumentative.

17 Q You can answer.

18 A One more time.

19 Q Is this a one-off to all the  
20 discrimination you allege you suffered from the  
21 waiting times?

22 A I'm not understanding.

23 Q You claimed the customers walked out  
24 because they couldn't their credit checked, right?

25 A Partially. That's not exactly what I



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2 said.

3 Q You testified it took too long for their  
4 credit to be checked such they would get frustrated  
5 and leave, right?

6 A Right. I didn't state that for every  
7 single customer I sat with.

8 Q How many customers did it happen with?

9 A I don't remember. It's four years later.

10 Q This is very important because it's part  
11 of your federal lawsuit in federal court with a  
12 federal judge, and I would like to understand how  
13 many customers on a ratio basis did this happen with  
14 and how many did it not happen with?

15 A Realistically, I would say I would sit  
16 with about two, two to three people daily. Out of  
17 those two to three people, at least two of them were  
18 walking out at this time because of the longer wait  
19 periods.

20 Q Every day two out of three people?

21 A More or less.

22 Q This is one of the three that didn't walk  
23 out?

24 A Possibly, but then again you did state  
25 that I made a phonecall to him. Can we go back to

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2 that?

3 Q Sure.

4 A It's possible that he did walk out because  
5 that phonecall was regarding the results of the  
6 credit being run finally.

7 Q Here with Leticia, outbound phonecall two  
8 days later, unable to leave message by the BDC rep.  
9 Outbound text message, phonecall by BDC rep said he  
10 needs money down and won't be ready until February  
11 on December 15th. December 31st, holding off until  
12 February. Lead lost January 16, 2018.

13 A It's really hard to remember by customer  
14 for something that happened four years ago  
15 especially since I have been in the business a  
16 couple of years and dealt with a bunch of customers.

17 Q That's why we have records of these  
18 things, correct?

19 MS. TROY: Objection. Argumentative.

20 Q You can answer.

21 A I mean if the stuff was accurate, I would  
22 agree.

23 Q You're saying this isn't accurate, that he  
24 called and said --

25 A I'm not saying that that isn't accurate.

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2 I'm talking about the documents overall.

3 Q Let's look at Defendant's Exhibit M.  
4 Bates-stamped D397 through D402. This is a bunch of  
5 messages here between the customer and someone named  
6 Tiffany, a BDC person about doing an application; do  
7 you see that?

8 (Defendant's Exhibit M, Marked for Identification.)

9 A Yes.

10 Q What is that application referring to?

11 A It's a prequalification application.

12 Q Which is something that is designed to  
13 assist customers with getting financing if they need  
14 it, correct?

15 A More or less.

16 Q It's a process that's done in advance to  
17 avoid having to do what have you complained about in  
18 this case, correct?

19 A Right.

20 Q On January 5th of 2019, Brianna, one of  
21 your witnesses, listed that the customer wants to  
22 know how much she would put down as a down payment,  
23 correct?

24 A Right.

25 Q The following day, Brianna set up an

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2 appointment for the next Saturday, no money down and  
3 has a trade-in, right?

4 A Right.

5 Q On January 12th, he was working with you  
6 and he was greeted by Louis and Manuel, correct?

7 MS. TROY: Objection. Documents speak for  
8 itself.

9 A I don't remember who this was, but I  
10 guess.

11 Q After that, the lead is marked lost the  
12 following month, correct?

13 A That was marked lost by the system so what  
14 that means is that after a certain amount of time  
15 that the customer is not contacted for whatever the  
16 case may be, that lead goes into a loss folder. So  
17 like it says there, it's by the system, not by a rep  
18 or anybody's name. There is no telling if that car  
19 was sold or not. I don't recall the name.

20 Q We will ascertain whether it was sold and  
21 we will provide evidence of that.

22 Going back to the January 6, 2019  
23 phonecall with Brianna to the customer, when it  
24 says, No money down and has a trade-in, what does  
25 that mean to you?

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2 A They want to trade in their car.

3 Q In that situation, is it the normal  
4 process that there is no money down required?

5 A One more time.

6 Q In a situation where there is a trade-in,  
7 is it normal that there is no money down required on  
8 the financing?

9 A In certain situations. It all depends on  
10 a person's credit.

11 Q On January 5th of '19, before this  
12 customer came in, he did the application necessary  
13 to check for financing in advance, correct?

14 MS. TROY: Objection.

15 A Yes.

16 Q So you didn't have to wait for anybody for  
17 this customer, correct?

18 A That's not true because this is the  
19 prequalification application. This is not an  
20 application that does a hard inquiry on the credit  
21 and shows exactly what the banks are looking for.  
22 We still have to run the credit ourselves, we still  
23 have to handwrite the application in order to do so,  
24 so that's not accurate.

25 Q The prequalification made it easier,

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2 didn't it?

3 MS. TROY: Objection. Argumentative.

4 A No. The prequalification doesn't make it  
5 easier unless we have access to those applications  
6 prior to them coming in.

7 Q We are going to look at Defendant's  
8 Exhibit N, I believe, which is Bates-stamped D522  
9 through D527. With this lead, Brianna set up an  
10 appointment for the following day after January 4th  
11 of '19, correct?

12 (Defendant's Exhibit N, Marked for Identification.)

13 MS. TROY: Objection. The document speaks  
14 for itself.

15 A Yes.

16 Q On January 10th, this customer came in for  
17 a showroom visit, correct?

18 A Right.

19 MS. TROY: Objection. The document speaks  
20 for itself.

21 Q In this particular instance, the customer  
22 left information on a car she was looking for and  
23 asked the dealership to let her know if you find  
24 that car, correct?

25 MS. TROY: Objection. The document speaks

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2 for itself.

3 A Yes.

4 Q Did you take any steps to find the car she  
5 wanted?

6 A Can we go back down to the dates?

7 Q Sure.

8 A That was towards the end of me leaving.  
9 So again, I don't recall. I don't remember this  
10 customer specifically, but I'm sure I did everything  
11 I could to look and see, especially at that point  
12 where I was at being at that time and that  
13 dealership.

14 Q This customer you didn't lose because of  
15 waiting for financing, right?

16 A No.

17 Q You lost this customer because you  
18 couldn't find the car she wanted, correct?

19 A I wouldn't say I lost the customer. If  
20 I'm not mistaken, I was out of that dealership a day  
21 or two later.

22 Q On January 14th, three days later,  
23 correct?

24 A I guess so.

25 Q It takes you an hour to sell a car,

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2 correct?

3 A More or less.

4 Q You had 36 hours to sell a car to this  
5 individual customer, correct?

6 A Yes. If you see there, it says she wants  
7 a E43 convertible or a 6 Series convertible. We  
8 never had those cars on our lot. Not a convertible,  
9 maybe an E class, maybe a 6 Series, yes, but  
10 convertible, to my knowledge, we did not have  
11 convertibles, either E43 or a 6 Series, on our lot.

12 Q You could procure one, couldn't you?

13 A I'm sorry?

14 MS. TROY: Objection. Argumentative.  
15 Repeat your question since she didn't hear.

16 Q You could procure one, couldn't you?

17 MS. TROY: Objection. Argumentative. She  
18 can answer.

19 A I'm sure I did look and I'm sure if I  
20 would have found it, she would been right back in  
21 the store.

22 Q Let's look at Defendant's O. It's  
23 Bates-stamped D536 through D543. Towards the bottom  
24 of this exhibit on November 24th of '18, it says  
25 that this customer has a 2010 Pathfinder for trade



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2 and mentioned trouble with credit and set an  
3 appointment for November 25th; do you see that?

4 A Yes.

5 Q On November 26th, it says that this  
6 customer worked with you recently, filed for  
7 bankruptcy, needs to bring back a letter from the  
8 trustee as to the budget she's allowed monthly  
9 towards vehicle. Will follow up, correct?

10 A Yes.

11 Q Do you remember working with this  
12 customer?

13 A No.

14 Q Do you recall whether the knowledge of the  
15 bankruptcy in this note indicates whether the credit  
16 check was done yet?

17 A Of course it was. How else would we have  
18 known about the bankruptcy being active?

19 Q With respect to this customer, performing  
20 the credit check was not an issue, correct?

21 A It looks like this was in November, so no.

22 Q Isn't it true you announced your pregnancy  
23 on November 23rd of '18?

24 A I believe so.

25 Q This happened after you announced your

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2 pregnancy, correct?

3 A Yes.

4 Q Your argument that your pregnancy was the  
5 reason why it took longer to check credit history is  
6 inaccurate with respect to this customer, correct?

7 A No, that's incorrect. If you recall, I  
8 did say that Isaac was the dad of the dealership and  
9 when the dad left, everybody did as they pleased, so  
10 there is that.

11 Q As far as you know, Isaac was the one who  
12 pulled the credit for this one?

13 A I'm not sure. What I'm saying is that,  
14 yes, I announced my pregnancy on November 23rd. I  
15 only remember that because it's my mother's  
16 birthday. I remember announcing my pregnancy then,  
17 but the discrimination did not happen until after  
18 Isaac left because the dad of the dealership was no  
19 longer watching. There was no jumping in or trying  
20 to stop things from happening. That's what my point  
21 is.

22 Q It says here on December 27th, The  
23 customer came for a second time and left very upset.  
24 She's in the middle of a bankruptcy and we can't  
25 help her; do you see that?

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2 A Yes.

3 Q Isn't it true that sometimes you can't  
4 help a customer even if you do the credit check?

5 MS. TROY: Objection. Argumentative.

6 A Of course that's true, but again, I  
7 mentioned that I might have sat with two or three or  
8 maybe more customers a day. That could have been  
9 one of the very few that that happened with.

10 Q Let's go to Defendant's Exhibit O,  
11 Bates-stamped D633 through D636.  
12 (Defendant's Exhibit O, Marked for Identification.)  
13 BY MR. KATAEV:

14 Q On this particular one it says, On  
15 December 29 of 2018, Brianna found out that this  
16 customer was interested in a RAV4 and will be in  
17 today and if not with follow up; do you see that?

18 A Yes.

19 Q On January 4th, she reiterated the  
20 interest in the RAV4 and set an appointment for the  
21 following day, correct?

22 A Yes.

23 Q It says that on January 5th, the text  
24 message by Brianna asked the customer to ask for you  
25 when the customer arrives, correct?

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2 MS. TROY: Objection. Document speaks for  
3 itself.

4 A Yes.

5 Q On January 6th, there is a message by  
6 Brianna saying the customer will call back if he's  
7 still interested, correct?

8 A Correct.

9 MS. TROY: Objection. The document speaks  
10 for itself.

11 MR. KATAEV: Your objection is noted.

12 Q On March 28, this individual bought a  
13 different car from somewhere else, correct?

14 A I guess so.

15 MS. TROY: Objection. The document speaks  
16 for itself.

17 Q There is no indication there that there  
18 were any issues with getting a credit check done,  
19 correct?

20 A It also doesn't indicate that the customer  
21 ever came in. Yes, he made the appointment, yes,  
22 Brianna told him to ask for me. It doesn't look  
23 like he ever came in.

24 (Defendant's Exhibit P, Marked for Identification.)

25 MR. KATAEV: Bates numbered to be D804 to

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2 D806. This will be P.

3 BY MR. KATAEV:

4 Q This is a December 2018 lead, correct?

5 MS. TROY: Same objection as before, which  
6 is again, you're not having the client testify  
7 on her personal knowledge. You're having her  
8 read off the document.

9 MR. KATAEV: Your objection to noted.

10 BY MR. KATAEV:

11 Q Leticia, is this correct that it's a  
12 December 2018 lead?

13 A Yes.

14 Q It says here on December 20th of '18 that  
15 the cosigner will do an application tomorrow,  
16 correct?

17 A Yes.

18 MS. TROY: Objection. The document speaks  
19 for itself. This is document is cut off.

20 MR. KATAEV: It's right here.

21 BY MR. KATAEV:

22 Q Based on this note, is it accurate to  
23 state that the customer came in?

24 MS. TROY: Objection. You're not having  
25 her testify on her personal knowledge. You're

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2 having her read off the document.

3 Q I'm asking her based on her personal  
4 knowledge whether, based on this note, the customer  
5 would have come in?

6 A If the customer did come in?

7 Q Yes.

8 A Can you scroll down a little more?

9 Q Did the customer come in?

10 A Yes.

11 Q It says here that the customer is coming  
12 with his cosigner tomorrow. Worked with Leticia  
13 last night. He was here, doesn't know specific  
14 time; do you see that?

15 A Yes.

16 Q In order for all of this to have happened,  
17 is it accurate to state that the financing was done  
18 already?

19 A Possible.

20 Q You did not end up selling this car  
21 because the lead was lost?

22 MS. TROY: Objection. The document speaks  
23 for itself.

24 A Again, that's a lost lead by the system  
25 that was put in three months later which is the

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2 general timeframe of a lost lead when not contacted,  
3 so I can't say it was not sold because he did  
4 mention bringing in a cosigner so I can't confirm or  
5 deny that.

6 Q You don't know if it was sold or not?

7 A I do not.

8 Q This is Defendant's Exhibit Q.

9 Bates-stamped D812 to D814.

10 (Defendant's Exhibit Q, Marked for Identification.)

11 BY MR. KATAEV:

12 Q At the bottom over here it says that this  
13 individual came in with approval from Capital One,  
14 correct?

15 MS. TROY: Same objection. You're not  
16 having her testify on her personal knowledge.  
17 You're having her read off the document.

18 A Yes. It does state that, but it doesn't  
19 necessarily mean they are approved.

20 Q You have a note over here, Bonus all  
21 capital S's; do you see that?

22 A Yes.

23 Q Why did you write this note?

24 A I have no idea. I don't remember.

25 Q This note was written about almost four

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2 hours after the showroom visit started?

3 A I don't recall. It's four years ago.

4 Q It says here on January 2 of '19 that  
5 Brianna noted that she's happy with the purchase?

6 A Okay.

7 Q And that means that you were able to make  
8 a sale on this vehicle, correct?

9 A Right.

10 Q Isaac was not here at this time, correct?

11 A Right.

12 Q Andris was the one who did the financing,  
13 correct?

14 A I can't answer that question because it  
15 could have been Serge or Andris.

16 Q Defendant's Exhibit R. Bates-stamped D815  
17 through D820.

18 (Defendant's Exhibit R, Marked for Identification.)

19 MS. TROY: Same objection. You're not  
20 having her testify on her personal knowledge.  
21 You're having her read off the document.

22 MR. KATAEV: You're only repeating  
23 yourself to waste time. Make a blanket  
24 objection.

25 MS. TROY: I'm going to make a blanket



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objection which is the whole set of documents from I think Exhibit C onwards. You're basically having her read off the document. A lot of the times you're not even asking her to testify on her personal knowledge. So that's not an appropriate objection. The document speaks for itself.

MR. KATAEV: It is an inappropriate objection and is a violation of Rule 30 and you have been warned multiple times not to do that.

MS. TROY: You asked me to make a blanket objection so I did.

MR. KATAEV: That's it, stop.

MS. TROY: I did.

MR. KATAEV: Stop already.

MS. TROY: I did what you asked me to. I don't know what you want me to do. You asked me to do something and I do it and then you're like, Stop.

MR. KATAEV: Please stop.

BY MR. KATAEV:

Q Look at D818 in this particular exhibit. There is a note here from Brianna that the customer is waiting to see if Uber is going to hire him; do

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2 you see that?

3 A Yes.

4 Q In this particular instance no credit  
5 check was probably performed because he was waiting  
6 to see if he was going to be hired, correct?

7 A That's not entirely true.

8 Q As far as you know, the credit was done on  
9 this particular customer?

10 A I'm not saying it was or was not done  
11 because there is no telling on this document. I  
12 can't really tell.

13 Q That's fine. This is Defendant's  
14 Exhibit S, bearing Bates-stamped numbers D842 to  
15 D847.  
16 (Defendant's Exhibit S, Marked for Identification.)

17 MS. TROY: Same objections as the  
18 uniformed one, blanket one.

19 Q This customer visited the showroom on  
20 December 12th of 2018, correct?

21 A Yes.

22 Q This lead was subsequently marked lost,  
23 correct?

24 A Again, it's by the system three months  
25 later, which is uniform for that CRM to do. It does

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2 that. If it has not been contacted within three  
3 months as it shows on every one you mentioned that  
4 shows lost by the system, it's uniform.

5 Q Isn't it true that if a vehicle is sold  
6 it's marked in the CRM system?

7 MS. TROY: Objection. Argumentative. She  
8 can answer.

9 A Again, it's if they do it. It's not a yes  
10 or no. If they do it.

11 Q If they fail to do it, isn't it true they  
12 won't get paid a commission?

13 A I don't believe that is entirely true  
14 because they do not get paid on shows that are  
15 walk-ins, so I can't say that's entirely true.

16 MR. KATAEV: Off the record for a minute.  
17 (Whereupon, an off-the-record discussion was held.)  
18 BY MR. KATAEV:

19 Q During the course of your employment with  
20 Hillside Auto Outlet, there came an occasion where  
21 you brought another employee on to work with us,  
22 correct?

23 A Yes.

24 Q That individual's name is Brianna,  
25 correct?

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2 A Yes.

3 Q Brianna is a childhood friend of yours,  
4 correct?

5 A Yes.

6 Q She continued working at the dealership  
7 after you left, correct?

8 A Right.

9 Q To your knowledge, is she still working at  
10 the dealership?

11 A No. Not that I know of.

12 Q This is Defendant's Exhibit T. 1165  
13 through 1167.

14 (Defendant's Exhibit T, Marked for Identification.)

15 MS. TROY: Also just the blanket objection  
16 applies to Exhibit T.

17 BY MR. KATAEV:

18 Q For this particular lead, this customer  
19 was noted by Tiffany from BDC as a cash buy,  
20 correct?

21 A Yes.

22 Q For a cash buy, that means there will be  
23 no financing, correct?

24 A Correct.

25 Q There is showroom visit on December 8th,

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2 correct?

3 A Right.

4 Q You followed up with a phonecall two days  
5 later, correct?

6 A Right.

7 Q You follow up again two days after that,  
8 correct?

9 A Right.

10 Q You were not able to sell the vehicle,  
11 correct?

12 A Right.

13 Q Andris Guzman did not play any role in  
14 that because there was no financing, correct?

15 A Just because it's not noted there doesn't  
16 mean he did not because Serge was in the back office  
17 so he probably prepared the buyer's order but the  
18 first point of contact would have been Guzman.

19 Q For what?

20 A Because he's the sales manager so he's  
21 going to want to know what's going on, what the  
22 customer is asking for, how much he's looking to pay  
23 and so on.

24 Q Going to Defendant's Exhibit U. It's a  
25 document Bates-stamped 1186. I will represent to

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2 you that this is from the payroll company and it  
3 lists your hire date and termination date; do you  
4 see that?

5 A Yes.

6 (Defendant's Exhibit U, Marked for Identification.)

7 BY MR. KATAEV:

8 Q To your knowledge, is this accurate you  
9 were hired on May 22nd of 2018?

10 A Yes.

11 Q And you were separated from employment on  
12 January 14th of 2019, correct?

13 A Yes.

14 Q That means you were employed with the  
15 dealership for approximately eight months, correct?

16 A Right.

17 Q I will represent to you that we are  
18 looking at your first paystub, which will be part of  
19 this exhibit D1187.

20 I have D1186 through D1250 will be  
21 marked as Defendant's Exhibit V.

22 (Defendant's Exhibit V, Marked for Identification.)

23 BY MR. KATAEV:

24 Q This pay period starts on May 22nd until  
25 May 28th of 2018, correct?

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2 A Right.

3 Q This pay period you only received the \$300  
4 weekly salary, correct?

5 A That's incorrect. It shows the \$780 in  
6 commissions. We were paid in two separate checks.  
7 You get a salary check every week of \$300 and  
8 commission was separated to reduce the amount of  
9 taxes taken out.

10 Q On this particular case, your first week  
11 you sold approximately five cars, correct?

12 A I think it averages out to 5.2 cars  
13 because that's when I was receiving the 5 percent.

14 Q Right. The following week, you only sold  
15 approximately two cars, correct?

16 MS. TROY: Can you break that down,  
17 Emanuel?

18 A That looks like it might have been  
19 two-and-a-half cars because if another salesperson  
20 had to help out, you would split the deal with the  
21 other salespeople, so I mean, it could have been  
22 carrying over from the 5 percent.

23 Q Approximately two to three cars in this  
24 one, right?

25 A It might been two. It could have been

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2 that 5 percent carrying over.

3 Q For the third week it was just two cars,  
4 correct?

5 A Right.

6 Q In the week of June 12 to June 18, it was  
7 no cars, correct?

8 MS. TROY: Emanuel, you're scrolling  
9 really fast. Could you show us the two  
10 paystubs corresponding?

11 BY MR. KATAEV:

12 Q I will represent to you that I see one  
13 paystub and it's June 12th to June 18th and the one  
14 before is for the week prior and the one after is  
15 for the week after. This is D1193.

16 MS. TROY: You're saying there is only one  
17 for that week?

18 BY MR. KATAEV:

19 Q You know what, I want to do this on the  
20 record. If you go to the week prior, it shows  
21 year-to-date of \$1,505. If you go to the week after  
22 it shows \$2,165.

23 A That paystub must just not be in there.

24 Q Maybe it's later on in the production but  
25 we will see.



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2 Based on the difference in the gross  
3 for commissions and the total being \$660, you sold  
4 approximately four cars, correct?

5 A One more time.

6 MS. TROY: How did you come up with your  
7 numbers?

8 BY MR. KATAEV:

9 Q You look at D1193, which is the week from  
10 June 12th, it shows a gross year-to-date of \$2,165,  
11 if you go to the week prior, it's \$1,505. You get  
12 \$660.

13 MS. TROY: What is your question?

14 Q \$660 and you divide that by \$150, I get  
15 4.4 cars. You sold approximately four cars,  
16 correct?

17 A Yes.

18 Q In the following week with the commission  
19 being \$615, you also sold approximately four cars,  
20 correct?

21 A Yes.

22 Q In the week after that, \$655, again  
23 approximately four cars, correct?

24 A It's hard to say because it's confusing  
25 with that 5 percent.

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2 Q Four to five, right?

3 A Yes.

4 Q Going into the week of July 3rd through  
5 July 9 from the prior week that we just went over,  
6 your gross remains the same and you didn't receive  
7 any commission check. So you didn't sell any cars  
8 that week?

9 MS. TROY: Slow down a little bit. In the  
10 July 3 to the July 9 for 1198 is your question?

11 MR. KATAEV: That's correct.

12 BY MR. KATAEV:

13 Q I'm showing the week before had the same  
14 gross and I'm showing going back to the same paystub  
15 it's the same gross and this is the following week.  
16 So is it accurate to say that you sold no cars the  
17 week of July 2018, the first week?

18 MS. TROY: Could you show me the two pages  
19 again with the two numbers?

20 MR. KATAEV: Yes, of course.

21 MS. TROY: What number are you talking  
22 about?

23 MR. KATAEV: D1198 is the benchmark. The  
24 gross is listed as \$3,435 year to date. If you  
25 go back to \$1,197 to the week prior, it remains

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2 the same, it's \$3,435 year to date. If you go  
3 to D1199, which is the one after, it's the  
4 following week.

5 BY MR. KATAEV:

6 Q Based on those three paystubs from D1197  
7 to D1199, is it fair to say that you did not sell  
8 any vehicles that week?

9 A I don't recall. I'm trying to think back.  
10 Maybe I was on vacation or something.

11 MR. KATAEV: Off the record.

12 (Whereupon, an off-the-record discussion was held.)

13 BY MR. KATAEV:

14 Q We have reviewed the pages bearing  
15 Bates-stamped numbers D1197 through D1200, which is  
16 a comparison of two weeks worth of regular pay of  
17 \$300 a week and commissions for those two weeks.  
18 And my question is: Based on our review of the  
19 record of the paystub for July 3rd through July 9th  
20 bearing Bates-stamped D1198, you did not sell any  
21 cars during that week, correct?

22 A I did not say that I did not sell any  
23 cars. I was not paid any commission. Sometimes you  
24 wouldn't get paid on all your cars if the deal was  
25 not funded. Sometimes the deals were funded and I

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2 would still receive pay on it. I'm not sure what  
3 happened there.

4 Q In the following week, you received \$900  
5 in commissions and that means you sold at least --

6 A Six cars.

7 Q Correct?

8 A I don't know if it was all for that week  
9 or if there were was some carried over. \$900 would  
10 be for six cars.

11 Q The following week you made \$1,400 which  
12 means you sold at least nine cars, correct?

13 A Right. So there is definitely a  
14 possibility they were carried over from previous  
15 weeks or I had a really great week.

16 Q This is your best week so far, two months  
17 into your employment?

18 A I don't remember.

19 Q I will represent to you that this is the  
20 first four-figure week you had. The following week  
21 after you made the \$1,400, you made \$450 and that  
22 means you sold at least three cars, correct?

23 A Right.

24 Q The week after that \$300 which means at  
25 least two cars, correct?

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2 A Right.

3 Q The week after that you top your prior  
4 record and made \$1,450 which is a least nine cars,  
5 correct?

6 A Right.

7 MS. TROY: Could you do the division for  
8 us?

9 A It's a little over nine cars.

10 Q \$1,450 divided by \$150 is 9.67.

11 A It might have been a split deal in there.  
12 That looks like it was after the time that I stopped  
13 receiving the 5 percent.

14 Q This is for the week ending August 20th  
15 from August 14th with a pay date of August 24th. I  
16 will represent to you that your complaint states  
17 that Jay stopped working on August 24.

18 A Okay. It might have been part of it.  
19 Again, this is a long time ago. I don't recall  
20 exact dates of which she left or was fired.

21 Q My question is basically: Did you sell at  
22 least nine cars this week?

23 A Yes.

24 Q We are moving now into the next week and  
25 here you sold -- you have \$1,200 in commissions

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2 which means you sold at least eight cars, correct?

3 A Right. It could have been cars carrying  
4 over.

5 Q I understand. This following week the  
6 commission was only \$150, which means you sold only  
7 one car?

8 A Possibly.

9 Q The following week, \$450, which means only  
10 three cars?

11 A Again possibly.

12 Q The following week, again just three cars  
13 which is \$450, correct?

14 A Yes.

15 Q And now the next week, which we are  
16 looking at September 18 to September 24, it's \$750  
17 which is five cars, correct?

18 A Yes.

19 Q Again, \$750 for the following week is five  
20 cars, correct?

21 A Yes.

22 Q And this particular week \$900 is seven  
23 cars, correct?

24 A Which one are you talking about? What  
25 number are you talking about?

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2 MS. TROY: Could you do your calculation  
3 on the screen.

4 Q We are up to D1223 for the period starting  
5 and ending December 2nd through 8th of 2018, and  
6 \$900 divided by \$150 is six. You sold at least six  
7 cars that week, correct?

8 A Correct.

9 Q The following week is \$700. Divide that  
10 by \$150, you sold at least four cars, correct?

11 A Right.

12 Q The following week is \$800, which means  
13 you sold at least five cars, correct?

14 A I'm sorry.

15 Q Five cars.

16 MS. TROY: Put your calculator on the  
17 screen. It's easier. You're saying \$800. How  
18 many cars?

19 A Five and change.

20 Q You sold at least five cars that week.

21 A Again, it might be carried over. It's  
22 hard to say.

23 Q Okay. The next week we are approaching  
24 the end of October of '18 is \$1,050. When you  
25 divide that by \$150, it equals exactly seven. You

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2 sold at least seven cars that week, correct?

3 A Yes.

4 Q The following week, again, I have \$1,050  
5 which means you sold at least seven cars the next  
6 week?

7 MS. TROY: Emanuel, instead of at least,  
8 do the -- at least seven cars.

9 A Yes.

10 Q The same for the following week, which is  
11 Bates-stamped D1230, correct?

12 A Right.

13 Q I have the first week of November from the  
14 6th to the 12th with Bates-stamp D1232 and \$900,  
15 which means you sold at least six cars, correct?

16 A Right.

17 Q And here we have \$1,375 for the middle  
18 week of November from the 13th to the 19th. That  
19 means you sold at least nine cars, correct?

20 A Right.

21 Q Then during the almost last week of  
22 November, the 20th to 26th, I have \$450 which means  
23 three cars, correct?

24 A Right.

25 Q And then during the last week of November,



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2 I think following Thanksgiving, I have \$1,600 which  
3 is your best week ever so far and that means you  
4 sold at least ten cars, correct?

5 A Yes.

6 Q Now we are entering into the first week of  
7 December 2018. By the way, your best week after the  
8 \$1,600 was for the pay period November 27th to  
9 December 3rd after you announced your pregnancy,  
10 correct?

11 A Yes.

12 Q The following week you made \$825, which is  
13 at least five cars, correct?

14 A Right.

15 Q The second week in December you made \$625,  
16 which means at least four cars, correct?

17 A Right.

18 Q And then \$500 for the third week in  
19 December, which is approximately three cars,  
20 correct?

21 A Right.

22 Q The final week in December you didn't sell  
23 any cars, correct?

24 A It looks like I sold two.

25 Q I apologize, I saw zero. I didn't see the

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2 \$350. Withdrawn.

3 For the final week during the  
4 Christmas holiday season from December 25th to  
5 December 31st, you sold at least two cars, correct?

6 A Right.

7 Q Finally in January of '19, you sold at  
8 least five cars based on your commission of \$825,  
9 correct?

10 A Right.

11 Q The second week of January, you have \$350  
12 in commissions which means you sold at least two  
13 cars, correct?

14 A Right.

15 Q And then you no longer sold anymore  
16 vehicles because you quit, correct?

17 A Correct.

18 Q Okay.

19 MS. TROY: With the qualification that  
20 it's for the Defendants.

21 MR. KATAEV: What does that mean?

22 MS. TROY: Like, she sold cars at other  
23 places, just not at the Defendants'. You said  
24 she no longer sold any cars.

25 MR. KATAEV: Right, only for defendants.

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2 Skipping a bunch of exhibits, I want to  
3 see if I want to do any of the others. We can  
4 take a quick break. It's 3:59. Let's  
5 reconvene at 4:05.

6 (Whereupon, a short recess was taken.)

7 BY MR. KATAEV:

8 Q I have placed up on the screen what will  
9 be marked as Defendant's Exhibit W.

10 A Before we move on to this, you caught me  
11 in a little bit of confusion. You said my best week  
12 was \$1,600 in the first week of December. If you  
13 recall, that was \$1,000 of that was a bonus from  
14 November.

15 Q Okay.

16 A It was really four cars for that first  
17 week and that was definitely cars rolling over from  
18 November because if we go back to the other document  
19 where the sold log was, I didn't sell a car until  
20 the 6th or something like that.

21 Q Okay. You want to supplement your answer  
22 just to explain that? That's okay, I understand  
23 that.

24 A Of course. It looks like I sold  
25 20-something cars for that month, when there is no

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2 way I sold that many in three days.

3 Q What is the most cars you ever sold in a  
4 month?

5 A 30. 33, actually but not at this  
6 dealership. When I went to NYC Motor Cars.

7 Q I'm saying at this dealership?

8 A 27, I believe or 28.

9 Q Do you remember what month that was?

10 A That was in the month of November. That's  
11 why I received that \$1,000 bonus on December 3rd.

12 Q The \$1,600 that you received was a \$1,000  
13 bonus and the \$600 was for at least four cars,  
14 correct?

15 A Correct.

16 Q Thank you for clarifying your answer.

17 Going back to Exhibit W, I will  
18 represent to you this is an April 28, 2022 order  
19 from Judge Pamela J. Chen. She's the judge that I  
20 will represent to you was the prior judge assigned  
21 to this case, and the order says here on April 1st,  
22 2022, this Court ordered Plaintiff to notify the  
23 Court by filing a letter on the docket within seven  
24 days of the Second Circuit issuing a decision in  
25 Case Number 21-1653.

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2 It says Second Circuit issued its  
3 decision on April 12, 2022. As of today, April 28,  
4 2022, Plaintiff has not filed a letter on the docket  
5 to notify the Court. Accordingly, on or before  
6 May 4th, 2022, Plaintiff shall file a letter on her  
7 docket with the proposed next step of how this case  
8 should proceed.

9 Do you see that?

10 A Yes.

11 MR. KATAEV: Off the record.

12 (Whereupon, an off-the-record discussion was held.)

13 MR. KATAEV: Back on the record. I was  
14 about to ask some questions about this, but  
15 Plaintiff wanted to make some objections. Go  
16 ahead.

17 MS. TROY: The same objection as before.  
18 The same blanket objection applies to this  
19 exhibit.

20 BY MR. KATAEV:

21 Q Just a question I have about this,  
22 Ms. Stidhum, are you aware that there was an appeal  
23 of a prior case?

24 A Yes.

25 Q You're aware that the prior case that was

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2 filed was dismissed, correct?

3 A Yes.

4 Q You're aware it was dismissed because it  
5 didn't remain with the EEOC for the statutory period  
6 of time?

7 A Yes.

8 Q You're aware that your law firm decided to  
9 appeal that decision?

10 A Yes, I am.

11 Q Are you aware --

12 MS. TROY: I'm going to make sure to  
13 direct my client to not divulge any  
14 communication she may have had with her  
15 attorney as part of any response.

16 BY MR. KATAEV:

17 Q For this whole line of questioning, don't  
18 tell me anything that you said to your attorneys or  
19 your attorneys said to you.

20 You're aware that because there was  
21 an appeal filed with the Second Circuit, that there  
22 was something scheduled that was called a Camp  
23 conference?

24 A I'm not sure.

25 Q Just to explain what a Camp conference is,

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2 it's a conference designed for the purpose of  
3 discussing settlement over the phone.

4 A Okay, yes.

5 Q Are you aware that that Camp conference  
6 was held?

7 A Yes.

8 Q Did you participate in that conference?

9 A I don't believe so. This is not the one  
10 we are talking about that was in person, correct?

11 Q It's not, that's correct.

12 A So no.

13 Q You were not present, correct?

14 A No.

15 Q Are you aware of what transpired at this  
16 conference without telling me what was said?

17 A Yes.

18 MR. KATAEV: Go off the record.

19 (Whereupon, an off-the-record discussion was held.)

20 BY MR. KATAEV:

21 Q Just some general questions.

22 When you quit, you're not alleging  
23 that you were constructively discharged, correct?

24 A No.

25 MS. TROY: Objection. Calls for legal

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2 conclusion. I don't know if she knows what  
3 you're asking.

4 BY MR. KATAEV:

5 Q I will give some more layman's terms  
6 question.

7 The reason why you quit was because  
8 you were not willing to wait until Isaac dealt with  
9 the issues that you were raising to his attention,  
10 correct?

11 A That's not true, because I indeed did wait  
12 for Isaac and we did have an in-person conversation  
13 prior to me making my final decision.

14 Q The reason why you quit is because you did  
15 not want to wait any further after having that  
16 discussion, correct?

17 A I mean, at that point it was very, you  
18 know, obvious that I wasn't getting the promotion I  
19 wanted or was promised, not wanted I should say, or  
20 any type of raise or anything like that, so yes, I  
21 did quit because of that.

22 Q You're not saying it was intolerable to  
23 work at Hillside Auto Outlet based on those  
24 conditions, correct?

25 A I mean, it was because who wants to sit in



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2 a place for ten hours a day pregnant, tired and not  
3 make any money.

4 Q And the reason why you found it  
5 intolerable to work there is because you were not  
6 making money?

7 A And because of the way I was being  
8 treated. I would be blatantly ignored when I had a  
9 customer.

10 Q And the only person that was ignoring you  
11 was Andris Guzman, correct?

12 A Which was my point of contact at the time  
13 of Isaac's vacation, yes.

14 Q You testified earlier that with respect to  
15 your workweek, you were off on Wednesdays and every  
16 other Sunday, correct?

17 A Yes.

18 Q What time would you come in every morning  
19 and what time would you leave every evening?

20 A 10:00 to 8:00, sometimes 9:00, 10:00 p.m.  
21 Depends on the workday, how many customers we have.

22 Q You had at least a one-hour lunch break,  
23 correct?

24 A Not necessarily. We would eat as we went.  
25 There was no set time or timeframe to eat.

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2 Q Would you eat together with other  
3 salespeople or did you eat on your own?

4 A Depends. If we both didn't have a  
5 customer at the time, we would go grab lunch  
6 together. We didn't have a designated area to eat  
7 so we would eat right at our desk.

8 Q Did you go to restaurants and sit there  
9 and eat?

10 A Never.

11 Q Never?

12 A Never. Picked up food and come back.

13 Q You had the option of staying at the  
14 restaurant if you wanted, correct?

15 A Not really. It was kind of eat and go  
16 type of place. Eat and get back to work.

17 Q When you went to get lunch, how did you  
18 pay for lunch?

19 A I mean, with my money earned there, cash,  
20 credit, whatever.

21 Q Sometimes you used cash, sometimes you  
22 used credit?

23 A Yes.

24 Q Did you ever have a charge back?

25 A A charge back?

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2 MS. TROY: Explain that.

3 Q Dealership parlance.

4 A I know what a charge back is. If a car  
5 was returned, they would take my commission back. I  
6 never dealt with a charge back, not that I remember  
7 at least.

8 Q Are you aware of any vehicles you sold  
9 being returned for any reason?

10 A Not that I can remember.

11 MS. TROY: Again, qualifying this is  
12 during Hillside?

13 MR. KATAEV: Yes.

14 BY MR. KATAEV:

15 Q Would you be surprised to learn there were  
16 vehicles that were charged back that were not taken  
17 from you?

18 A Yes.

19 MR. KATAEV: Off the record.

20 (Whereupon, an off-the-record discussion was held.)

21 BY MR. KATAEV:

22 Q Are you aware that Defendants filed a  
23 motion to dismiss this case?

24 A Yes.

25 Q Are you in receipt of a copy of the

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2 decision from Judge Gonzalez denying the motion to  
3 dismiss?

4 A Yes.

5 Q You read it, correct?

6 A Yes.

7 Q I'm going to place up on the screen what  
8 will be marked as Defendant's Exhibit X.

9 (Defendant's Exhibit X, Marked for Identification.)

10 BY MR. KATAEV:

11 Q I will represent to you that this is the  
12 decision by Judge Gonzalez and I want to point you  
13 to a particular paragraph and ask you some questions  
14 about it, okay?

15 A Okay.

16 Q Look at page seven. It says, Plaintiff's  
17 allegations that she was deprived access to the  
18 Dealertrack program and "could no longer run  
19 customer credit scores or prefill financing  
20 applications," are not enough to constitute adverse  
21 actions because as Plaintiff herself described, she  
22 was given unique access and received a benefit that  
23 none of her colleagues received.

24 You see that?

25 A Yes.

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2 Q It says in the next sentence, However, the  
3 Court finds that a decrease in Plaintiff's take-home  
4 pay can constitute an adverse action.

5 Do you see that?

6 A Yes.

7 Q You're saying that your decrease in  
8 take-home pay occurred because you had to wait  
9 longer for Andris to check customer's credit  
10 histories, correct?

11 A Correct.

12 Q But I have shown you multiple examples  
13 where you lost sales for reasons other than that,  
14 correct?

15 A You have showed me examples that don't  
16 really apply to this because you showed me a cash  
17 deal, which obviously there is no need to run  
18 anybody's credit and you showed me two examples of  
19 customers needing cosigners and then there is no  
20 more notes after, and then it will say that the lead  
21 was lost three months later because nobody wrote  
22 anything so I can't agree to that. That is not  
23 correct.

24 Q It says here, Plaintiff has plausibly  
25 alleged that Defendants decreased her bonus by

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2 increasing the average wait time for her customers  
3 after she announced her pregnancy without doing the  
4 same to the customer's of her nonpregnant coworkers  
5 thereby decreasing the number of sales she was able  
6 to make.

7 Do you see that?

8 A Yes.

9 Q How is it that the Defendants increased  
10 the average wait time for your customers?

11 A Again, by making them wait to run their  
12 credit, by prioritizing other customers even though  
13 they came afterwards, after me having no Dealertrack  
14 access.

15 Q During your employment with Hillside Auto  
16 Outlet, did you physically witness new customers  
17 coming in, being checked before your customers that  
18 were already waiting?

19 A Yes. That's how I knew that my customers  
20 were being pushed to the side and taken -- I'm  
21 sorry, not taken, other customers were being  
22 prioritized.

23 Q You acknowledge either way that even if  
24 Andris Guzman quickly processed the applications,  
25 you would still have to face the hurdle of closing

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2 the sale based on whatever the numbers were and so  
3 on and so forth, correct?

4 A That's not my original complaint.

5 Q I'm asking you even if Andris complied  
6 with your request to more quickly do it, there was a  
7 greater potential that you would still not be able  
8 to close the sale for a variety of different  
9 reasons, correct?

10 MS. TROY: Objection. Argumentative. She  
11 may answer.

12 A I'm sorry, one more time.

13 MR. KATAEV: Read it read.

14 (Whereupon, the referred to question was read back  
15 by the reporter.)

16 MS. TROY: Objection. Calls for  
17 conjecture. She may answer.

18 A I don't know how to answer that question  
19 properly because if that was the case then it would  
20 be the same as before pretty much, before I even had  
21 Dealertrack access. I'm not really sure how to  
22 answer that question.

23 Q Even after Andris would give you the  
24 numbers, there was a potential the customer would  
25 say, You know what, I don't want to buy this

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2 vehicle, correct?

3 A Of course, but that would have been the  
4 case the whole time regardless. That's not what the  
5 complaint is.

6 Q Even after Andris provided you the  
7 numbers, the numbers could be such that the monthly  
8 payment that would be required by the bank could be  
9 too high, correct?

10 A Yes.

11 Q The down payment amount required by the  
12 bank could also be too high, correct?

13 A Yes.

14 Q Even if Andris timely provided you the  
15 numbers, it didn't necessary mean you would close  
16 the sale, correct?

17 A It's partially correct.

18 Q It only increased your chance at making  
19 the sale, but it didn't in any way guarantee you  
20 would make the sale, correct?

21 A Correct.

22 Q Okay. I have a couple more exhibits. Let  
23 me see if I need them.

24 MS. TROY: Emanuel, we are sitting at the  
25 4:30 mark.



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2 MR. KATAEV: We are almost done.

3 MS. TROY: This has never been produced to  
4 us as any document production.

5 MR. KATAEV: It has been produced to the  
6 judge in this case. Please stop interrupting  
7 my deposition.

8 MS. TROY: I'm 1,000 percent --

9 MR. KATAEV: Stop interrupting my  
10 deposition.

11 MS. TROY: I'm going to note my objection.  
12 This has never been produced before.

13 MR. KATAEV: Your objection is noted. It  
14 has been produced to the court. Stop.

15 MS. TROY: I'm 1,000 percent sure it was  
16 not produced.

17 MR. KATAEV: Are you willing to bet  
18 \$10,000 on it?

19 MS. TROY: The Dropbox is only the  
20 documents. This is no audio file.

21 MR. KATAEV: Stop interrupting my  
22 deposition.

23 MS. TROY: Go ahead. I'm noting my  
24 objection.

25 (Defendant's Exhibit Y, Marked for Identification.)

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2 BY MR. KATAEV:

3 Q Defendants are producing Exhibit Y and  
4 it's an audio recording, which I'm going to play.  
5 It's approximately three minutes long. I would like  
6 the witness to listen and I will ask some questions  
7 afterwards.

8 Are you ready?

9 A Yes.

10 Q Thank you.

11 (Audio is played.)

12 MS. TROY: Let the record reflect that  
13 this was not produced as part of the document  
14 production response. Instead Mr. Kataev  
15 recorded me without my consent and subsequently  
16 other courts have found that he should not be  
17 able to record such conversations.

18 BY MR. KATAEV:

19 Q Okay. I have some questions about this  
20 recording, Ms. Stidhum. Were you ever apprized of  
21 the fact that your attorney and I had what's called  
22 a telephonic meet and confer?

23 A Yes.

24 Q Were you aware that this was the tenor of  
25 the communications that were had?

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2 A No.

3 Q Do you believe the way the attorneys are  
4 acting in this phonecall are acting professional?

5 MS. TROY: I'm going to object.

6 A Can I object? Can I object?

7 Q No, you can't object. Your attorney can  
8 object and you can answer the question. Please go  
9 ahead and make your objection.

10 MS. TROY: Repeat your question. What is  
11 your question?

12 BY MR. KATAEV:

13 Q From what you hear on this phonecall, do  
14 you believe the way the attorneys are acting on this  
15 phonecall are acting professional?

16 MS. TROY: How is this relevant?

17 MR. KATAEV: Are you objecting because of  
18 relevance, Counselor?

19 MS. TROY: I'm objecting.

20 MR. KATAEV: Your objection is noted.  
21 Please answer the question.

22 MS. TROY: Great. We will make a motion  
23 to strike and potentially move for costs  
24 afterward.

25

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2 BY MR. KATAEV:

3 Q Please answer the question.

4 A I'm not sure. I don't know the nature. I  
5 know that things can get heated.

6 Q Are you aware that interrogatory number 9  
7 is not something that Defendants were compelled to  
8 provide?

9 A Can I know what an interrogatory is? I  
10 don't know what it is.

11 Q Withdrawn.

12 I believe I have two or three more  
13 exhibits.

14 MS. TROY: You had a couple of exhibits  
15 30 minutes ago.

16 MR. KATAEV: Well, now I have a couple of  
17 exhibits 30 minutes later.

18 MS. TROY: For the record, it's now 4:40.  
19 We were supposed to start at 9:00. He wasn't  
20 ready to start at 9:00.

21 MR. KATAEV: Based on testimonial time.  
22 Enough with this.

23 I'm placing up on the screen what will be  
24 marked as Defendant's Exhibit Z.

25 (Defendant's Exhibit Z, Marked for Identification.)

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2 BY MR. KATAEV:

3 Q I will represent to you that this is a  
4 December 6, 2022 order from Judge Mann, who  
5 previously presided as the magistrate judge in this  
6 case. You can read the whole thing but my focus  
7 will be on this aspect right here. Let me know when  
8 you're done reading it.

9 (Witness perusing document.)

10 MS. TROY: I would like to note for the  
11 record that this does not reflect our  
12 correction to some of the misrepresentations  
13 made by Defendants' counsel.

14 A I'm finished.

15 Q Do you see this part of this order that  
16 Judge Mann notes that Plaintiff's counsel persisted  
17 in engaging in gratuitous and ad hominem attacks on  
18 me, Defense counsel?

19 A Yes.

20 Q Are you aware that your attorney spends  
21 time on your case engaging in personal attacks  
22 against unnecessarily?

23 A No.

24 Q You should be aware of that.

25 MS. TROY: We are going to motion to

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2 strike that after this deposition.

3 MR. KATAEV: Make the motion after.

4 Please don't interrupt my deposition.

5 BY MR. KATAEV:

6 Q I'm placing up on the screen what will be  
7 marked as Defendant's Exhibit AA. I will represent  
8 to you this is a December 22, 2022 decision by  
9 Magistrate Judge Mann who previously presided over  
10 this case. It's resolving a letter motion filed by  
11 your law firm that's representing you.

12 MS. TROY: Scroll through the entirety of  
13 the document. It's 10 pages.

14 MR. KATAEV: You have the document. I'm  
15 going to focus on what I need to ask.

16 MS. TROY: She's entitled to review the  
17 entirety of the document.

18 MR. KATAEV: That's fine. I would like to  
19 finish asking the question before I do that.

20 MS. TROY: She can review the entirety of  
21 the document.

22 MR. KATAEV: Stop interrupting my  
23 deposition. I'm asking a question. Please do  
24 not interrupt me. You've interrupted me three  
25 times during this question. Make your

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objection after I'm done speaking. Wait until I'm done. Have some manners.

MS. TROY: I'm asking that she be --

MR. KATAEV: Stop. Stop. I want to ask my question. Stop interrupting my deposition.

MS. TROY: My request was noted. To the extent you ignore it, it's also noted for the record.

MR. KATAEV: It's not being ignored. I would like to ask my question. Please stop interrupting my deposition.

MS. TROY: Again, my request was noted.

MR. KATAEV: Stop interrupting my deposition. When I finish asking my question, I will give you an opportunity to make an objection. Stop interrupting my deposition.

BY MR. KATAEV:

Q As I was saying, I'm presenting to you Defendant's Exhibit AA which is a Memorandum of Order by Judge Mann, the previous judge in this case, and in this decision she's resolving a letter motion filed by your attorneys to compel Defendants to provide supplemental responses to Plaintiff's interrogatories and document demands.

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2 Do you see that?

3 A Yes.

4 Q Thank you. If you would like to take a  
5 second to read through this and tell me when to  
6 scroll I will do so.

7 (Witness perusing document.)

8 A Okay.

9 Q I don't have any questions about this, but  
10 at your counsel's request, we are going to waste our  
11 time reviewing the entire document.

12 MS. TROY: If you don't have any questions  
13 about it, we don't need to waste our time going  
14 through the document.

15 MR. KATAEV: Thank you, I'm so glad we  
16 were able to achieve that.

17 BY MR. KATAEV:

18 Q I'm highlighting a portion --

19 MS. TROY: If you have a question --

20 MR. KATAEV: I said I don't have a  
21 questions about this portion.

22 BY MR. KATAEV:

23 Q Back on the record. Page two of  
24 Document 37. This is Defendants' Exhibit AA and I'm  
25 highlighting, Nevertheless Plaintiff's ad hominem



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2 attacks are unwarranted; do you see that?

3 A Yes.

4 Q This is the second reference in which your  
5 attorneys are being accused of making personal  
6 attacks against me.

7 Are you aware of that?

8 A No.

9 Q It says in here that while the judge in  
10 the Southern District of New York did, in fact,  
11 criticize me for quote/unquote making frivolous  
12 requests in that case, the firm, Troy Law PLLC,  
13 which represents the Plaintiff in the instant action  
14 has been sanctioned, punished in literally dozens of  
15 cases, too numerous to recount in both this district  
16 and the Southern District of New York.

17 Are you aware, Ms. Stidhum, that the  
18 law firm that you hired has been sanctioned,  
19 punished in dozens of cases too numerous recount?

20 MS. TROY: I'm going to make my objection  
21 to this question. Irrelevant to the case and  
22 we are going to motion to strike that question  
23 and response and we are going to move for costs  
24 and fees to that question.

25 MR. KATAEV: Your objection is noted.

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2 BY MR. KATAEV:

3 Q Please answer the question.

4 A No.

5 Q I have one final exhibit and this  
6 deposition is over.

7 Ms. Stidhum, are you aware that there  
8 was an appeal of the decision denying the motion to  
9 dismiss?

10 A Yes.

11 Q Are you aware that that appeal has been  
12 withdrawn?

13 A Yes.

14 MR. KATAEV: I believe I'm done. I will  
15 be right back.

16 (Short recess taken.)

17 BY MR. KATAEV:

18 Q Ms. Stidhum, do you have a recollection as  
19 to when Ali came to first work at Hillside Auto  
20 Outlet?

21 A I don't really remember. It was between  
22 sometime in mid November to early December. Isaac  
23 was trying to train him for when he leaves to kind  
24 of handle what he handles while he was on vacation.

25 Q When did Isaac go on vacation?

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2 A Early December. Maybe mid December.

3 Q It wouldn't be outside the realm of reason  
4 for Ali to have come to begin work in the beginning  
5 of December, correct?

6 MS. TROY: Objection as to form. She may  
7 answer.

8 A I'm sorry. I don't understand. I don't  
9 understand.

10 Q You wouldn't find it hard to believe that  
11 Ali began working in the beginning of December 2018,  
12 correct?

13 A No. That's what I just stated.

14 Q Okay. You disclosed to everyone that you  
15 were pregnant in late November of 2018, correct?

16 A Correct.

17 Q The conversation about a sales manager  
18 promotion happened after Ali started working there,  
19 correct?

20 A That's incorrect. That happened prior.

21 Q That conversation happened between  
22 yourself, Ali and Isaac; did it not?

23 A No.

24 Q You're saying that Isaac had an  
25 independent conversation with you first without Ali

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2 present?

3 A Ali was never in the equation when we had  
4 that managerial talk.

5 MR. KATAEV: Give me one second.

6 Last question.

7 MS. TROY: You have like five last  
8 questions already.

9 MR. KATAEV: Congratulations for noting  
10 that.

11 BY MR. KATAEV:

12 Q If the first conversation you had about  
13 the promotion occurred with Ali present, then it  
14 is --

15 MS. TROY: Objection. Mischaracterizes  
16 witness testimony. You can continue to ask  
17 your question.

18 MR. KATAEV: You can't object in the  
19 middle of my question. I'm going to rephrase  
20 the question.

21 BY MR. KATAEV:

22 Q If it is, in fact, true that your  
23 conversation with Isaac about a promotion occurred  
24 with Ali present, then it is true that that  
25 conversation occurred after you told everyone you're

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pregnant, correct?

MS. TROY: Objection. Mischaracterizes  
witness testimony. That's not what she said.

A I just said Ali was not present for that  
conversation at all. In fact, I thought that the  
month of November me exceeding expectations of every  
other month was going to push me into that position  
even more because it was already a conversation  
prior to me doing the max cars I ever did at that  
dealership.

MR. KATAEV: Thank you for your time  
today. I have no further questions.

(Time noted: 4:57 p.m.)

\_\_\_\_\_  
LETICIA F. STIDHUM

Subscribed and sworn to before me this \_\_\_\_ day  
of \_\_\_\_\_ 2023.

\_\_\_\_\_, Notary Public.

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I N D E X

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Attorney Kataev has retained all exhibits.

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C E R T I F I C A T I O N

I, RUTHAYN SHALOM, a Court Reporter  
and Notary Public within and for the State  
of New York, do hereby certify:

That the witness whose deposition  
is hereinbefore set forth, was duly sworn  
by me, and that the within transcript is a  
true record of the testimony given by such  
witness.

I further certify that I am not  
related to any of the parties to this action  
by blood or marriage, and that I am in no way  
interested in the outcome of this matter.

IN WITNESS WHEREOF, I have hereunto  
set my hand this 6th day of March, 2023.

Ruthayn Shalom  
RUTHAYN SHALOM



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ERRATA SHEET

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\_\_\_\_\_  
LETICIA F. STIDHUM

Subscribed and sworn to before me

this \_\_\_\_ day of \_\_\_\_\_, 2023

\_\_\_\_\_, Notary Public.

\_\_\_\_\_  
MY COMMISSION EXPIRES:

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